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Plaintiff & Plaintiff In Pro Per

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David W. Slayton,
Executive Officer/Clerk of Court,
By Y. Tarasyuk, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
STANLEY MOSK COURTHOUSE

DR. STEWART LUCAS MURREY, an individual;)	Case No. 25STCV02792
)	
Plaintiff,)	COMPLAINT FOR:
)	
v.)	1) Strict Product Liability
)	2) Negligence
)	3) Violation of Bus. And Prof. § 17200
Facebook, Inc. ("Facebook"), a publicly traded company; "Are We Dating The Same Guy" ("AWDTSG"), a Facebook group with hundreds of iterations world-wide; Paola Sanchez, an individual; Anonymous Creators, Administrators and/or Moderators of AWDTSG; Anonymous Facebook account; The Daily Mail, a newspaper company based in the United Kingdom; Associated Newspaper LTD, a private limited company based in the United Kingdom; Peter Sheridan, an individual; Daniel Bates, an individual; Taryn Pedler, an individual; Arthur Parashar, an individual; Raven Saunt, an individual; Katherine Poer-Anthony, an individual; Anonymous organizer; Kelly Gibbons, an individual; Elly Shariat, an individual; Lena Vanderford, an individual; Amy Blalock, an individual; Liv Burger, an individual; Vanessa Valdes, an individual; Ainka Wiz, an individual; Kelyn Rodriguez, an individual; "Holden_Guardian_Co"; and DOES 1 through 50, inclusive;)	4) Violation of the California Consumer Legal Remedies Act, Cal. Civ. § 1750, et seq.
)	5) Defamation – Libel
)	6) Defamation – Libel <i>per se</i>
)	7) Defamation – per quod
)	8) False Light
)	9) Intentional Infliction of Emotional Distress
)	10) Misappropriation of Name and Likeness
)	11) Civil Harassment
)	12) Unjust Enrichment
)	13) Sex-Based Discrimination In Violation Of The Unruh Civil Rights Act (California Civil Code § 51)
)	14) Gender Violence In Violation Of California Civil Code § 52.4
)	15) Cyberbullying
)	16) Conspiracy to Weaponize and Profit From Defective Products to Harm Plaintiff's Reputation, Right to Free Speech, Sexual Identity; and to Distress and Cyberbully Plaintiff
Defendants.)	17) Declaratory Relief
)	

I. PARTIES

1. Plaintiff Dr. Stewart Lucas Murrey (“Dr. Murrey”) is and at all times mentioned herein was, an individual, over the age of majority, residing in the City of Los Angeles, County of Los Angeles, State of California.

2. Having earned his Ph.D from Yale University in 2010 and having published his first two scholarly books in 2014 and 2015 on Greek tragedy, money and modern time, Dr. Murrey has achieved and maintained an excellent reputation in his community for his scholarly work and professionalism in business as well for his compassionate nature and general good spirit as a person.

3. Defendant Facebook, Inc. (“Facebook”), is incorporated in the state of Delaware with executive offices located at 1601 Willow Rd. in Menlo Park, California 94025 while its headquarters is located at 1 Hacker Way also in Menlo Park, California 94025. Working with the national security state agencies such as the Central Intelligence Agency (“CIA”), the department of defense (“DOD”), homeland security and foreign nation-state “intelligence” agencies like Israel’s Mossad, Facebook unlawfully provides data surveillance on hundreds of millions of American people and other foreign peoples without informing them of said criminal governmental organizations. Because of its unprecedented harm and censorship of Americans and other peoples across earth due to Facebook’s billions of (mostly fake and anonymous) users, this mafia organization has achieved a market value that exceeds a half-trillion dollars. Facebook is responsible for strict product liability, negligence deceptive business practices and other causes noted below.

4. Defendant “Are We Dating The Same Guy?” (“AWDTSG”) is a Facebook group with hundreds of iterations world-wide and is liable for negligence and other causes noted below.

5. Defendant Paola Sanchez (“Sanchez”) is reasonably presumed to be the creator of the

1 above-noted Facebook group AWDTSO that boasts hundreds of iterations world-wide and has tens of
2 millions of Facebook members and she is liable for negligence and other causes noted below.

3 6. Defendants anonymous creators, administrators (“admins”) and moderators (“mods”)
4 of AWDTSO are anonymous creators, administrators and moderators of the above-noted Facebook
5 group AWDTSO that boasts hundreds of iterations world-wide and has tens of millions of members
6 and they are liable for negligence and other causes noted below.

7 7. For purposes of this action, AWDTSO, Sanchez, its creators, admins and mods are
8 collectively referred to as AWDTSO.

9 8. Defendant anonymous Facebook account is an unknown individual and/or individuals
10 responsible for impersonation and harassment of plaintiff on Facebook.

11 9. Plaintiff is informed and believes and thereon alleges that defendant Daily Mail is a
12 company based in the United Kingdom that does business in California and operates websites
13 accessible here with its principal place of business Northcliffe House, 2 Derry St., Kensington,
14 London W8 5TT.

15 10. Plaintiff is informed and believes and thereon alleges that defendant Associated
16 Newspaper LTD (“ANL”) is a company based in the United Kingdom that does business in
17 California and operates websites accessible here with its principal place of business Northcliffe
18 House, 2 Derry St., Kensington, London W8 5TT. On information and belief ANL owns the Daily
19 Mail.

20 11. On information and belief defendant Peter Sheridan is an individual residing in Los
21 Angeles county who was engaged as an agent of the Daily Mail and/or ANL investigating plaintiff’s
22 background and publishing private facts about him.

23 12. On information and belief defendant Daniel Bates is an individual residing in Los
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1 Angeles county who was engaged as an agent of the Daily Mail and/or ANL investigating plaintiff's
2 background and publishing private facts about him.

3 13. On information and belief defendant Taryn Pedler is an individual residing in Los
4 Angeles county who was engaged as an agent of the Daily Mail and/or ANL investigating plaintiff's
5 background and publishing private facts about him.
6

7 14. On information and belief defendant Arthur Parashar is an individual residing in Los
8 Angeles county who was engaged as an agent of the Daily Mail and/or ANL investigating plaintiff's
9 background and publishing private facts about him.

10 15. On information and belief defendant Raven Saunt is an individual residing in Los
11 Angeles county who was engaged as an agent of the Daily Mail and/or ANL investigating plaintiff's
12 background and publishing private facts about him.
13

14 16. For purposes of this action, Daily Mail, ANL, Peter Sheridan, Daniel Bates, Taryn
15 Pedler, Arthur Parashar and Raven Saunt are collectively referred to as "Daily Mail".
16

17 17. On information and belief defendant Katherine Poer-Anthony is an individual residing
18 in Los Angeles county who made statements to the Daily Mail and/or ANL regarding plaintiff's
19 background and private facts about him.

20 18. Defendants, Kelly Gibbons ("Gibbons"), Liv Burger ("Burger"), Elly Shariat
21 ("Shariat"), Ainka Wiz ("Wiz"), Amy Blalock ("Blalock"), Vanessa Valdes ("Valdes"), Lena
22 Vanderford ("Vanderford"), Kelyn Rodriguez ("Rodrigeuz"), "Anonymous group member", and
23 "Anonymous organizer" are all individuals residing and/or presumed to be residing in Los Angeles
24 country and all created and published a GoFundMe webpage.
25

26 19. Defendant "Holden_Guardian_Co" is an anonymous Reddit user who resides in and/or
27 is presumed to be residing in Los Angeles county.
28

1 20. The true names and capacities, whether individual, corporate, associate, partnership,
2 limited liability company or otherwise of doe defendants 1-50 are unknown to plaintiff who therefore
3 sues said defendants by such fictitious names and will seek leave to amend his complaint to show
4 their true names and capacities when the same has been ascertained. Plaintiff alleges on information
5 and belief that each of the fictitiously-named defendants are responsible in some manner for the
6 wrongful conduct herein alleged and that such wrongful conduct caused harm to plaintiff.
7

8 **II. JURISDICTION**

9 21. The Court has general jurisdiction in this case because plaintiff Dr. Murrey resides
10 within the county of Los Angeles and the criminal acts and civil torts committed by defendants
11 occurred either online and/or in and/or near the county of Los Angeles.
12

13 **III. CONTINUING VIOLATIONS**

14 22. The wrongful acts and omissions giving rise to the defendants' liability in this action
15 commenced on or about 2019, if not before, and have been and are "continuing" in nature as of the
16 date of signing of this complaint. Plaintiff reserves the right to amend this complaint as new and
17 additional facts and claims arise or become known to him.
18

19 **IV. BACKGROUND AND STATEMENT OF FACTS**

20 23. Ever since plaintiff published his first two books in 2014 and 2015 with Noam
21 Chomsky's praise plaintiff has suffered political attacks on his person and reputation. To what extent
22 said attacks co-mingle with any and all women scroned by plaintiff remains to be seen.
23

24 24. In 2016 and 2017 anonymous online accounts published defamatory statements about
25 plaintiff on the website WWW.CHEATERREPORT.COM ("Cheaterreport"). Said anonymous
26 attacks also targeted plaintiff's girlfriend at the time while she struggled with cancer to which she
27 finally succumbed on 10 March 2018. Said anonymous individuals then quickly exploited her death
28

1 to harm plaintiff by alleging that he had murdered her with “rat poison”. Many of them were
2 unmasked and caught for having committed insurance fraud to steal money from plaintiff and others.

3 25. In 2019 Plaintiff sued Cheaterreport. His research revealed that the criminals who
4 operated and profited from Cheaterreport included Domingo Rivera and Aaron Minc, both of whom
5 have direct ties to the national security state and mafia centered in Ohio, Washington D.C. and
6 elsewhere. Whereas Rivera admitted under oath in federal court to working in United States Navy
7 Cybersecurity and having had highest level security clearance, Minc’s life-project has been exposed
8 as extorting money from people who have been harmed by anonymous statements on websites such
9 as Cheaterreport run by Minc’s co-criminal conspirators, including, but not limited to Rivera.
10

11 26. Plaintiff’s research further revealed a network of anonymous Cheaterreport-like
12 websites had paid **Facebook** to advertise in furtherance of their online extortion scam. Although
13 plaintiff served **Facebook** a subpoena to unmask the identities who paid Facebook for said
14 Cheaterreport advertising, the familiar corruption of the American legal system stood in the way. In
15 particular, the judge on this case (LASC case no. 19SMCV00935) refused to allow plaintiff to
16 compel Facebook to reveal the true identities involved in said monetary transactions without any
17 legal justification, nor rationale.
18

19 27. While plaintiff continued his scholarly work and criticism of the national security state
20 and its derangement of social media, he discovered that the **defective platform and app Facebook**
21 and its liable products (such as its defective algorithms and reward “points”) had been weaponized to
22 target plaintiff since at least 2021. Said liable products of Facebook (“Facebook”) are defective
23 specifically because they fail to filter and/or stop the circulation of harmful representations to billions
24 of viewers worldwide *even after Facebook is put on notice*.
25

26 28. In particular, during 2023 and since plaintiff began to obtain evidence of a cyber-
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1 attack on his person including defamatory claims that include, but are not limited to the following
2 statements:

- 3 a) an anonymous Facebook account stated that “[p]ublic records show [that] he
4 [plaintiff] has several domestic violence charges filed against him plus
5 involvement in [a] MURDER case of his ex wife” that plaintiff “is
6 DANGEROUS”; and that plaintiff “[f]iled 11 court cases against women in 33
7 months trying to extort money from them”;
- 8 b) Gibbons stated that plaintiff “pressed lawsuits against a number of women to
9 extort money from them and was suspected in the murder of his ex[-]wife”; that
10 plaintiff engages in “extortion lawsuits”; is under “murder suspicion” –
11 presumably for murdering his girlfriend who passed from cancer in 2018 –; that
12 plaintiff is guilty of “fraudulent behavior”, “using a false identity”, “posing a
13 significant risk of attempting to obtain money from other users through deceitful
14 means”, is “suing a company that catches cheaters and the suspicion of murdering
15 his wife?! Dateline vibes”, that plaintiff is “obviously a predator”, whose Ph.D
16 from Yale University is fraudulent;
- 17 c) an anonymous group member stated plaintiff “killed” his “ex”; that plaintiff has
18 committed “crimes!”; that plaintiff “said he was an [a]ttorney”; and that the online
19 dating app “[H]inge” banned him “for fraudulent behavior”;
- 20 d) Blalock stated that “I’m afraid if there’s any missing women in LA – he [plaintiff]
21 has something to do with it” and that “[h]e [plaintiff] [i]s going to end up on
22 Dateline one day.”
- 23 e) Shariat stated that plaintiff aggressively stalked her via her Instagram posts and
24 finally tracked her down at a hotel in Beverly Hills whereat plaintiff grabbed her
25 wrist violently and acted so harassingly that even years later Shariat is unable to
26 sleep and still wakes up in terror;
- 27 f) Vanderford stated that plaintiff is an “abusive murderer”; that he has acted
28 “Fraudulent”; that “He is truly dangerous”; and Vanderford posted statements that
“[p]ublic records show [that] he [plaintiff] has several domestic violence charges
filed against him plus involvement in [a] MURDER case of his ex wife” that
plaintiff “is DANGEROUS”; and that plaintiff “[f]iled 11 court cases against
women in 33 months trying to extort money from them”;
- g) Wiz stated that plaintiff was “a murder suspect” and that “exes has accused him of
‘stds’”;
- h) and Rodriguez stated that plaintiff was “on the ca [California] court[‘]s listing”
because “He’s been labeled a vexatious litigator”.

24 All of the above-noted statements are false. Plaintiff has never been charged, much less convicted
25 of any crime his entire life. In fact, plaintiff is well-known for being an honest and fair person.

26 Plaintiff properly obtained a Ph.D from Yale University in 2011 before going on to write and publish
27 several books and articles recognized by leading scholars around the world such as Noam Chomsky
28

1 who celebrates plaintiff's works on the backs of plaintiff's books. Plaintiff's writings are available at
2 libraries of universities and colleges world-wide and within multiple fields and specialties of
3 scholarship from ancient history, early historic periods, classical Greece, philosophy, poetry,
4 literature, politics, religion, modern history, etc. After contacting Facebook which failed to respond
5 whatsoever plaintiff filed LAPD and FBI reports and a lawsuit in 2023 to bring these evil-doers to
6 justice (see LASC case no. 23STCV14890).

8 29. After serving some of the defendants from said 2023 lawsuit (LASC case no.
9 23STCV14890) and initiating early forms of litigation an anonymous organizer, Valdes, Burger,
10 Gibbons, Blalock, Shariat and Rodriguez published a GoFundMe webpage on 7 February 2024:
11 <https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles> whereupon they
12 published Shariat's defamatory statements that plaintiff stalked and harassed Shariat at a hotel in
13 Beverly Hills. These statements are also false and defendants unjustly enriched themselves by
14 obtaining thousands of dollars from said harmful defamation. Defendants then went on national and
15 international news media outlets promoting their GoFundMe webpage and said defamatory
16 statements to billions of viewers.

19 30. At approximately the same time in early April 2024 *The Daily Mail* published a litany
20 of articles about plaintiff all misrepresenting him as a stalker and committing various other crimes:

- 21 a) In his Daily Mail article from 13 April 2024: **"The world's most vilified man**
22 **speaks for the first time: An online female hate-mob has accused him of**
23 **stalking, extortion and MURDER. But, we reveal, there are also dark episodes**
24 **in his past..."**¹ Sheridan states that plaintiff was "involved in his wife's death" and
25 that he was **arrested for being "involved in his wife's death"**. This is false.
26 Sheridan quotes Kartherine Anthony-Poer saying plaintiff dated her daughter and
27 stalked her. **"He stalked her, followed her and would show up at her house."**
28 This is false. Sheridan states: **"he [plaintiff] revealed that police had indeed**
suspected him of murder." This is false. Probate attorneys lied unlawfully in court
starting a rumor that plaintiff had been arrested for murder. Plaintiff then sued the
police and reasonably suspected as much. However, after six (6) depositions

¹ <https://www.dailymail.co.uk/news/article-13305141/stewart-lucas-murrey-sue-women-social-media.html>

1 plaintiff confirmed that the subject-arrest arrest for which he was never charged
2 regarded only the issue of forgery. The dirty police involved were sued and this case
3 settled in plaintiff's favor. Sheridan never asked plaintiff about any of this prior to
4 this publication though he had the opportunity to email him. Sheridan states: **"His**
5 **case was dismissed by the court in May 2020, receiving no damages."** This is
6 false. Plaintiff significantly received monetary compensation for this settlement.
7 Sheridan states while citing an anonymous source: "'This man attempted to destroy
8 my life and my family,' said the woman, who asked not to be identified publicly.
9 She dated him for a year and after the break-up, she sought to warn other women
10 about him in an online forum. She added: 'He dragged me to court for two years
11 after dating and slapped me with at least 12 separate lawsuits which were settled
12 before trial.'" This is also all false, to say nothing of the fact that it is absurd to state
13 that plaintiff sued one person 12 separate times. Sherdian states: "A similar suit
14 followed against CheaterReport.com, a website that encouraged users to report a
15 cheating wife, husband, boyfriend or girlfriend. The case was dismissed two months
16 later when the Los Angeles Superior Court ruled that it lacked jurisdiction." This is
17 false. Plaintiff's Cheaterreport case went on for years and exposed Facebook
18 working with Cheaterreport and the national security state. This article also posted
19 plaintiff's private texts and pictures of him where he is accompanied by an
20 individual serving papers. Plaintiff was legally and properly serving his lawsuit to
21 Gibbons and doing research on her address. But this article misrepresents the images
22 to suggest that plaintiff was stalking Gibbons. Sheridan also refers to websites like
23 AWDTSG and Cheaterreport as platforms for reasonable critiques of people. This is
24 a misrepresentation. Evidence suggests said platforms are psychological operations
25 to target innocent victims like plaintiff. Sheridan states that plaintiff's case against
26 Poer was dismissed, thus also misrepresents the fact that plaintiff settled his case
27 against Poer and all related cases to it in his favor. It is clear Sheridan intended to
28 harm plaintiff naming him **"The world's most vilified man [who has] dark**
episodes in his past..."

- b) In his Daily Mail article from 12 April 2024: **"The bachelor who sued 50 women
for calling him a bad date turned up at one of their homes even - though she
didn't give him her address - after she discovered online group that exposed
him"**² Bates sets up the false image that plaintiff was stalking Gibbons. Bates' title
further states that plaintiff is suing women "for calling him a bad date". This is
false. Bates' title further suggest that said Facebook AWDTSG group "exposed
him" i.e. his criminal nature or his threat to all of womankind. This is false. Bates
never contacted plaintiff nor did any due diligence regarding any of these issue.
Bates states: **"Stewart Lucas Murrey went to the Los Angeles home of Kelly
Gibbons at 10.45pm and returned again days later at 8.45pm"** again making a
harmful representation out of context. Bates' malicious misrepresentations continue.
**"Stewart Lucas Murrey went to the Los Angeles home of Kelly Gibbons at 10.45pm
and returned again days later at 8.45pm. [...] CCTV images from the property
appear to show him filming or taking photos on his mobile phone."** Bates also states:
"Stewart Lucas Murrey, the Los Angeles bachelor who unsuccessfully sued 50

² <https://www.dailymail.co.uk/news/article-13301999/The-bachelor-sued-50-women-calling-bad-date-turned-one-homes-didnt-address-discovered-online-group-exposed-him.html>

women for putting his womanizing ways on blast.” This is false. Plaintiff is successfully sued the majority of these women presently and his case against them was never unsuccessful. This article also posted plaintiff’s private texts and pictures of him where he is accompanied by an individual serving papers. Plaintiff was legally and properly serving his lawsuit to Gibbons and doing research on her address. But this article misrepresents the images to suggest that plaintiff was stalking Gibbons.

- c) In his Daily Mail article from 10 April 2024: **“Men set up rival to the ‘Are we Dating the Same Guy?’ Facebook group that exposes cheating partners - as experts warn anyone posting anonymously could still be unmasked”**³ Parashar states: “Stewart Lucas Murrey, from Santa Monica, alleged that he was subject to a barrage of false and defamatory posts and comments on the forum. But his case was dismissed by a judge”. This is false. Plaintiff’s case continues and is stronger than ever. Parashar conflates the entirety of plaintiff’s lawsuit against well over twenty (20) defendants with one single defendant who has been dismissed: “However, on Tuesday afternoon a judge dismissed the lawsuit, ruling in favour of Vanessa Valdez”. This misrepresentation continues: “The women argued they had done nothing wrong by posting their personal opinions in a private online group on social media.” In fact, because he is intentionally obfuscating the reality that my case is not dismissed, the crack journalist for the Daily Smell even invents a new grammatical mistake to confuse and manipulate his readers to harm plaintiff further: “The judge found no evidence of conspiracy on **the women’s part** and granted an Anti-SLAPP motion - which protects those who speak out on matters of public interest against abusive lawsuits made to silence them.” (emphasis added) Because Parashar intentionally seeks to misrepresent that ALL of plaintiff’s defendants have been dismissed instead of just one of more than twenty, he miswrites: **“women’s”**. This article also posted plaintiff’s private texts and pictures of him where he is accompanied by an individual serving papers. Plaintiff was legally and properly serving his lawsuit to Gibbons and doing research on her address. But this article misrepresents the images to suggest that plaintiff was stalking Gibbons.
- d) In her Daily Mail article from 9 April 2024: **“Judge dismisses a \$2.6 million claim by a bachelor, 32, against dozens of women who mocked him for being a ‘bad date’ in a viral Facebook group: ‘They did nothing wrong’”**⁴ Pedler also misrepresents that plaintiff’s lawsuit has been dismissed in her title and when she states: “The judge also reportedly found that based on the evidence presented, the court did not see any possibility of Murray winning against the defendants on any claim he made.” This is false. The judge made no such statement.
- e) In her Daily Mail article from 21 March 2024: **“LA bachelor launches LAWSUIT against more than 50 female members of controversial Facebook group that ‘exposes’ unfaithful men over claims they wrongfully branded him a MURDERER who had STIs in scathing online posts”**⁵ Saunt states in title and her article that AWDTSG innocently exposes cheating and harmful men: She

³ <https://www.dailymail.co.uk/news/article-13291977/Fight-against-women-naming-shaming-bad-exes.html>

⁴ <https://www.dailymail.co.uk/news/article-13287847/Judge-dismisses-defamation-lawsuit-brought-LA-bachelor-against-50-women-discovered-discussing-Facebook-group-called-dating-guy.html>

⁵ <https://www.dailymail.co.uk/femail/article-13224259/are-dating-guy-la-sues-women-murderer.html>

1 states: “The lawsuit stems from the social media group, which currently has more
2 than 52,500 members, **where daters issue warnings about potentially harmful or**
3 **deceitful men**” (emphasis added). This is false. AWDTSO is not an innocent group
4 that only “issue[s] warnings about potentially harmful or deceitful men”.

5 31. Along with failing to properly do its and their due diligence, *The Daily Mail* quoted
6 anonymous sources and one Katherine Poer-Anthony who stated on or before 13 April 2024 to the
7 Daily Mail that plaintiff had stalked her daughter. Anthony-Poer stated: “**He stalked her, followed**
8 **her and would show up at her house.**” This is all false.

9 32. On or about 12 April 2024 Valdes filed a police report against plaintiff wherein
10 Valdes claimed that plaintiff had “doxed” her i.e. electronically harassed her by posting harmful
11 information online (California Penal Code § 653.2). This is false. Valdes further harassed plaintiff by
12 filing a restraining order petition against plaintiff whose trial-hearing denied Valdes’ petition on 11
13 July 2024.

14 33. As a result of the above-noted intentional and malicious defamation, in particular in
15 regard to the false stories about stalking, plaintiff has been the subject of and received death threats.
16 Anonymous Facebook users also initiated and operated accounts impersonating and harassing
17 plaintiff. Other anonymous users such as “Holden_Guardian_Co” on Reddit.com claimed that
18 plaintiff suffers from psychological disorders such as autism. This is false.

19 34. One of the main reasons why plaintiff has been targeted by defendants is because he
20 happens to be a man i.e. his sex is male. Said sexual discrimination is the only reason why plaintiff
21 was excluded from Facebook AWDTSO groups: online websites, apps, forums etc. that all the
22 defendants conspired to aggressively promote and exploit to harm plaintiff. Although plaintiff
23 diligently tried several times to join AWDTSO forums to voice the truth about all these matters, each
24 time an anonymous administrator (“admin”) and/or moderator (“mod”) denied him permission to join
25 the group. Only when one corrupts American law can one exclude victims of misrepresentations from
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1 joining a group while they are harmfully portrayed to billions of viewers. In other words, only
2 because of sexual discrimination i.e. that fact that plaintiff happens to be male, was he never allowed
3 to join said Facebook AWDTSO forums to defend himself and exercise his right to free speech. That
4 this is a function of malice and intentional harm is shown by the fact that NONE of the above-noted
5 AWDTSO related Facebook agents and/or members ever gave plaintiff notice of any of the severely
6 harmful defamatory comments being disseminated about him for years before he discovered them. A
7 critical element of their conspiracy to gang-stalk and cyberbully plaintiff was that they wanted him to
8 suffer secretly. Still today defendants' assault on plaintiff online and offline continues.

10 35. Because of defendants' actions plaintiff has incurred substantial monetary damages.

11 **A. The Detrimental Impact of "Social Media" Platforms, Including Facebook**

12 36. One does not need be a genius to see that we live in a surveillance state. The primary
13 means by which the people are unlawfully monitored, controlled, censored and harmed are via
14 unlawful monopolies such as Facebook who function as fronts to conceal the national security state
15 and its dirty work in serving its wealthy masters. Anyone who dares think about it, much less talk
16 about it, is censored and severely punished – save the controlled opposition such as the new
17 mainstream alternative media i.e. puppets being used to lure in, identify and harm any truly decent
18 and innocent people with true hearts and minds. Thus the advanced form of fascism in which we live
19 that witnesses the endless dumbing down of the *instagoon populace* as the primacy technique through
20 which shadowy tyrants conceal their playbook. The banking crisis of 2008 and the "deadly" COVID-
21 19 pandemic accelerated this brainwashing, in particular because most people were degraded during
22 this time into using "social media" even more than before.

23 37. Given that money is finally a form of control, Facebook and other such companies
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1 push products that intend to maximize the time spent using the product and shaping peoples'
2 behavior. As everyone knows, these companies make money from attention. Worse, there are no
3 safety standards and no ethics board in the digital space, thus inviting citizens to apply the good,
4 original laws of the United States and its states to remedy the above-noted serious issues.
5

6 38. Facebook and its groups were aware of these facts and what plaintiff suffered, yet
7 failed to act to correct the safety hazards identified.

8 39. Social media giants like Facebook have seized the opportunity presented by the digital
9 wild west to manipulate and control the behavior of vulnerable people to maximize attention
10 dedicated to their social media platforms and thus maximize revenues and profits and punish those
11 who exercise their freedom of speech to discuss what is in truth and actual fact occurring, all while
12 conveniently shirking any safety responsibilities whatsoever.
13

14 **B. Facebook is an Embarrassment to Those Hiding the Anonymous Money-**
15 **Printers: it Reveals our Monetary System is not Organic, much less a Free-**
16 **Market**

17 40. Facebook is a “social media” application (“app”) that boasts of owning approximately
18 four (4) billion users worldwide and prides itself in being the most influenced app in human history
19 and with a market valuation of approximately a one and one-half (1.5) trillion dollars i.e.
20 \$1,500,000,000,000.00.

21 **C. Facebook’s App, Algorithm, Groups/Forums and Rewards, including, but not**
22 **limited to “Facebook points”**

23 41. Facebook is a worldwide brainwashing app parading itself as a social media app and
24 product which allows and encourages users/slaves to create, share, and view short video clips.

25 42. Facebook users/slaves who open the app are immediately confronted with an endless
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1 stream of curated content selected by Facebook and defendants' proprietary algorithm(s) and shown
2 to users/slavers on their Facebook webpages in various ways ("For You Page" and/or "FYP") which
3 is a defining feature of the Facebook platform.

4 43. According to Facebook and defendants, the FYP is central to the Facebook experience
5 and where most of our users spend their time.
6

7 44. Defendants' algorithm selects which content are shown to each user based on the
8 user's demographics, user interactions such as the content viewed and shared, and the seemingly
9 limitless amount of metadata tied to each user's digital presence and device settings which is
10 collected and analyzed by the Defendant Facebook et al.
11

12 45. Although Facebook claims that their algorithm is designed with safety as a
13 consideration, the algorithm is designed and employed to achieve a singular ultimate goal: increase
14 corporation profits i.e. increase control of people. Defendants' app, algorithm, groups and reward
15 Facebook "points" seek to show users content designed to keep users engaged and glued to the app
16 where they are encouraged only to participate more.
17

18 46. Facebook, its groups et al. prey upon vulnerable users who have mental disorders
19 and/or who are otherwise too weak mentally to confront the surveillance state in which we the people
20 now exist as slaves. Said Facebook users/slaves are thrust into a never-ending adrenal feedback loop
21 which creates addiction and a compelling urge to engage further in the Facebook app and its groups.
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23 47. Cultivating and feeding addictive use of the app through the algorithm translates into
24 greater revenues and control for defendants Facebook, its groups, et al.

25 48. ***Defendant Facebook, its AWDTSF forums et al. and their app, algorithm, groups,***
26 ***reward "points" are carrying out social and psychological programming and manipulation on an***
27 ***unprecedented scale, particularly among adults too mentally weak to see what is happening.***
28

1 49. Defendant Facebook, its AWDTSF forums et al. and their app, algorithm, groups,
2 reward “points” have created an environment in which said groups are widely promoted and result in
3 maximum user engagement and participation, thus financially benefitting Facebook, its AWDTSF
4 forums et al.

5 50. Facebook groups aggressively solicit outrageous content that involve users and their
6 victims being represented as harmfully as possible that mimics and often times “one-ups” other users
7 posting similarly outrageous content involving dangerous conduct, including, but not limited to the
8 gang-stalking, defamation and cyberbullying of plaintiff.

9 51. The Facebook algorithm(s) present said dangerous and harmful content and conduct to
10 users via their personal Facebook webpages and personal Facebook group webpages and feeds and
11 their FYPs and encourages users to create, share and participate in said harmful conduct of gang-
12 stalking, defamation and cyberbullying.

13 52. The Facebook algorithm(s), groups and reward “points” presents and incentivizes said
14 harmful content and behavior via their personal Facebook webpages and personal Facebook group
15 webpages and their feeds and their FYPs and thus encourages users to create, share and participate in
16 said harmful conduct of gang-stalking, defamation and cyberbullying to further harm their victims
17 without informing them or letting them join said Facebook groups to defend themselves.

18 53. There have been countless unknown victims of Facebook’s treachery, including, but
19 not limited to men harmed from Facebook AWDTSF forums and thus from the Facebook app,
20 algorithm(s), groups and reward “points” promoting said dangerous and harmful behavior.

21 54. By now everyone has heard of those who have been cyberbullied as having been
22 brought to the brink of suicide and/or have committed suicide.

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27 **D. Facebook, its AWDTSF Groups, its Creator Paola Sanchez, its Anonymous**
28 **Other Creators, its Administrators and its Moderators All Knew the**

Dangerous and Deadly Gang-Stalking, Defamation and Cyberbullying Had Irreparably Harmed Countless Victims, Including Plaintiff

55. Tragically, plaintiff is just the latest in a growing list of men (and women) severely injured as a result of the Facebook app, algorithm(s), groups and reward “points” promoting said dangerous and harmful behavior.

56. Defendants Facebook et al. unquestionably knew that the severely harmful content was spreading through its app and that its algorithm was specifically feeding the forums, and its members, inciting them to participate in the above-noted crimes and tortious malfeasance.

57. Defendants Facebook et al. knew or should have known that failing to take immediate and significant action to extinguish the spread of the severely harmful content about plaintiff would result in more injuries and deaths, especially among men who were unable to defend themselves, people who were too mentally exhausted and/or weak to understand the harm Facebook et al. continued to inflict upon them, as a result of their users attempting the attract attention to themselves.

58. Defendants Facebook et al. knew or should have known that their products—the app, algorithm, groups and “points”—were dangerously defective and in need of immediate and significant change to prevent users, especially men who were unable to defend themselves, people who were too mentally exhausted and/or weak to understand the harm Facebook et al. continued to inflict upon them, from said dangerous content that was known to have let to gang-stalking, defamation and cyberbullying.

59. Defendants Facebook et al. knew or should have known that a failure to take immediate and significant corrective action would result in an unreasonable and unacceptable risk that additional users and their target-victims, and people, would fall victim to the deadly content.

60. Despite this aforementioned knowledge, Defendants Facebook et al. outrageously took

1 no and/or completely inadequate action to extinguish and prevent the spread of the harmful content to
2 prevent said content from being shown to billions of users worldwide, also via their personal
3 Facebook webpages, group pages, their FYP despite knowing that such a failure would inevitably
4 lead to more injuries and deaths.

5
6 61. Despite this aforementioned knowledge, Defendants Facebook et al. outrageously
7 failed to change, update, and/or correct their algorithm, group behavior, reward points strategy to
8 prevent them from presenting users, specifically those targeting and the victims of said users, with the
9 dangerous content harming plaintiff despite knowing that such a failure would inevitably lead to
10 more severe injuries and possibly death.

11
12 62. Defendants Facebook et al. failed to take the necessary corrective action because it
13 would result in less user engagement on the app and thus less corporate profits and less control and
14 secret harm of the populace.

15
16 63. Defendants Facebook et al. prioritized greater corporate profits and control and harm
17 of the populace over the health and safety of its users and their victims, and specifically over the
18 health and safety of vulnerable people.

19 **E. Plaintiff Dr. Murrey's Fatal Facebook Experience**

20 64. Plaintiff Dr. Lucas Murrey is a well-respected and established scholar who has
21 authored serious books, articles and videos available at the most prestigious libraries across the
22 world. Said work has attracted praise from the most respectable intellectuals of our time. This
23 includes classicists and experts on the origins of western civilization, ancient Greece and Dionysus
24 such as Richard Seaford; theologians such as Ulrich Durchrow; literary scientists such as Bernhard
25 Böschenstein; contemporary philosophers such as Jean François Kervegan; and social-psychological
26 critics such as Noam Chomsky, to mention just a few.
27
28

1 65. Dr. Murrey was also given the opportunity to sell one of his grandmother's houses in
2 Lake Arrowhead in 2016 and early 2017 when the aforementioned recent wave of severe defamation
3 initiated, thus causing him already in 2017 to also lose hundreds of thousands of dollars from the real
4 estate business for which he had a signed contract.

5 66. Dr. Murrey continued to explore and critique the essence of technology in our time,
6 including the reckless abuse of data and surveillance by companies such as Facebook.

7 67. Facebook et al. suspiciously "permitted" the above-noted half-decade long
8 predatory and manipulative app, algorithm, groups and "points" to coalesce into a secret campaign to
9 ruin Dr. Murrey's life and legacy. Defendants AWDTSO and Daily Mail also "permitted" the above-
10 noted years long harm of plaintiff and in fact even amplified it with their own similarly destructive
11 algorithms and online marketing techniques.

12 68. Prompted by the never-ending stream of notifications from the Facebook app that
13 were pushed to the forefront of users' attention every day e.g. via their personal Facebook webpages,
14 group webpages and FYP, Dr. Murrey began to notice that his life and work were undergoing a
15 concentrated online assault.

16 69. Defendants Facebook et al.'s app, algorithm, groups and points pushed exceedingly
17 and unacceptably dangerous content to users gang-stalk, defame and cyberbully Dr. Murrey, thus
18 encouraging them to engage and participate in serious crimes and tortious malfeasance that severely
19 harmed plaintiff.

20 70. This tragedy and the unimaginable suffering endured by plaintiff was entirely
21 preventable had the defendants Facebook et al. not ignored the health and safety of its users,
22 particularly the vulnerable men who are the ongoing victims their product(s), in an effort to rake in
23 greater profits and control of the populace.

1 71. The intentionally manipulative app, algorithm, groups and points of defendants
2 Facebook et al. thrust unacceptably dangerous and harmful content before billions of users who
3 defendants knew to be circulating on its platform and groups and in front of an impressionable
4 mentally ill AWDTSO group members.

5 72. As a direct result of the defendants' corrosive marketing practices, plaintiff has
6 endured serious injuries.

7 73. Tragically, plaintiff is just the latest in a growing list of men (and women) severely
8 injured as a result of the Facebook app, algorithm(s), groups and reward "points" promoting said
9 dangerous and harmful behavior.

10 74. As a direct and proximate result of the defendants' carelessness, negligence, gross
11 negligence, recklessness, willful and wanton conduct, strict liability, failure to warn, and defective
12 design, plaintiff suffered serious, severe, injuries including, but not limited to gang-stalking,
13 defamation and cyberbullying.

14 75. As a direct and proximate result of the defendants' carelessness, negligence, gross
15 negligence, recklessness, willful and wanton conduct, strict liability, failure to warn, and defective
16 design, which resulted in the serious harm of plaintiff, he plaintiff has in the past and will continue in
17 the future to suffer great pecuniary loss, including, but not limited to loss of support, companionship
18 and comfort.

19 76. As a direct and proximate result of the defendants' carelessness, negligence, gross
20 negligence, recklessness, willful and wanton conduct, strict liability, failure to warn, and defective
21 design, plaintiff has been caused to incur and pay large and various expenses for various attempts to
22 rescue his reputation and legacy and means to survive for which plaintiff is entitled to compensation.

23 77. As a direct and proximate result of the defendants' carelessness, negligence, gross
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1 negligence, recklessness, willful and wanton conduct, strict liability, failure to warn, and defective
2 design, plaintiff claims all damages suffered, including, but not limited to the generality thereof, the
3 following: the severe injuries to plaintiff which resulted in the severe harm he suffered; anxiety,
4 horror, fear of impending death, mental disturbance, pain, suffering and other intangible losses which
5 plaintiff suffered during the past half-decade; the loss of future earning capacity suffered by plaintiff
6 from the date of his first injuries from the above-noted gang-stalking, defamation and cyberbullying
7 until the time in the future that he would have earned a salary had he not be assaulted and suffered as
8 a result of the injuries he sustained; and the loss and total limitation and deprivation of his normal
9 activities, pursuits and pleasures from the date of his first injury until such time in the future when he
10 will no longer be affected by the injuries sustained by reason of the defendants' carelessness,
11 negligence, gross negligence, recklessness, strict liability, failure to warn, and defective design.
12

13
14 78. As a direct and proximate result of the defendants' carelessness, negligence, gross
15 negligence, recklessness, willful and wanton conduct, strict liability, failure to warn, and defective
16 design, plaintiff has been forced to suffer the a protracted near-death experience of his identity.
17

18 79. Defendants are jointly and severally liable for the injuries and damages alleged herein.

19 80. Because of defendants' above-noted actions plaintiff has incurred substantial monetary
20 damages.
21

22 **V.**
23 **FIRST CAUSE OF ACTION**
24 **STRICT PRODUCT LIABILITY**
25 *Against Defendants Facebook, AWDTSB and Daily Mail*

26 81. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
27 they were fully set forth herein.
28

82. The application ("app") and platform Facebook that determines webpages and content

1 that each of its users see is a product that is downloaded and used by billions of people across the
2 world.

3 83. The Facebook app and its algorithm and its reward of Facebook “points” are designed,
4 developed, programmed, manufactured, marketed, sold, supplied, distributed, operated and/or
5 manages by the Facebook defendant.
6

7 84. Plaintiff is not seeking to hold Facebook liable as the publisher of third-party content
8 and instead intends to hold Facebook as well as AWDTSO and Daily Mail responsible for their
9 independent conduct as the designers, developers, programmers, manufacturers, sellers and/or
10 distributors of their dangerously defective apps, algorithms and reward “points”. Thus plaintiff’s
11 claims fall outside of any potential protections afforded by Section 230(c) of the Communications
12 Decency Act (“CDA”).
13

14 85. Defendants Facebook, AWDTSO and Dail Mail by and through its agents, servants,
15 workers, contractors, designers, developers, programmers, manufacturers, sellers, marketers,
16 suppliers, distributors, subsidiaries, sister corporations, parent companies, successor corporations
17 and/or predecessor corporations are strictly liable for the above-noted defective products that harmed
18 plaintiff since on or about early 2022 until the present because:
19

- 20 a) Facebook, AWDTSO and Daily Mail are engaged in the business of designing,
21 developing, programing, manufacturing, selling, supplying and/or distributing app
22 products and algorithms and reward “points” such as the Facebook, AWDTSO and Daily
23 Mail apps and their associated algorithms and reward “points” such as Facebook “points”;
- 24 b) the Facebook, AWDTSO and Daily Mail apps, algorithms and reward “points” that
25 caused plaintiff to suffer gang-staking, defamation and cyberbullying were designed,
26 created, programmed, developed, marketed and placed in the general stream of commerce
27 by defendants;
- 28 c) the Facebook, AWDTSO and Daily Mail apps, algorithms and reward “points” were
expected to and did reach billions of users causing said severe harm to plaintiff without
substantial change in the condition in which they were designed, developed, programmed,
manufactured, marketed, distributed and/or sold;
- d) the Facebook, AWDTSO and Daily Mail apps, algorithms and reward “points” that
caused plaintiff to suffer gang-staking, defamation and cyberbullying were designed,

created, programmed, developed, marketed and distributed and/or sold in the defective conditions for the reasons set forth herein.

86. The Facebook, AWDTSO and Daily Mail apps, algorithms and reward “points” were in a defective condition as: 1) the danger contained therein is unknowable and unacceptable to the everyday consumers; and/or 2) a reasonable person would conclude that the probability and seriousness of the harm caused by the subject products outweighs the burden or costs of taking precautions.

87. Defendants Facebook, AWDTSO and Dail Mail by and through their agents, servants, workers, contractors, designers, developers, programmers, manufacturers, sellers, marketers, suppliers, distributors, subsidiaries, sister corporations, parent companies, successor corporations and/or predecessor corporations are strictly liable for severe harm caused to plaintiff from the above-noted gang-stalking, defamation and cyberbullying since on or about early 2022 until the present by:

- a) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) in a defective condition;
- b) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) without adequate warnings;
- c) designing, developing, programing, manufacturing, selling, supplying and/or distributing a products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) without adequate remedies to gang-stalking, defamation and cyberbullying;
- d) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) that were not equipped, programmed with, or developed with the necessary safeguards required to prevent the circulation of gang-stalking, defamation and cyberbullying;
- e) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) that were not equipped, programmed with, or developed with the necessary safeguards required to prevent the circulation of severely harmful and false statements that result in severe gang-stalking, defamation and cyberbullying;
- f) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) that were intended to incite user addiction and manipulate users into

- participating in criminal behavior and tortious malfeasance, including, but not limited to the gang-stalking, defamation and cyberbullying of plaintiff;
- g) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) that were intended to incite user addiction and manipulate users into participating in criminal behavior and tortious malfeasance, including, but not limited to the gang-stalking, defamation and cyberbullying of plaintiff despite knowing that this would to severe injuries and/or deaths of the target victims of gang-stalking, defamation and cyberbullying;
 - h) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) that were intended to incite user addiction;
 - i) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) that preyed upon target victims who were not at first aware of the severe harm caused to them, who then were unable to exercise their free speech to defend themselves because they were excluded from Facebook forums, AWDTSO groups and/or unable to even make comments on allegedly public forums of Daily Mail articles where the harm occurred; and thus whose target victims were vulnerable;
 - j) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) that were intended to manipulate and/or encourage maximum engagement and/or participation by users;
 - k) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) that recommended inappropriate, dangerous and deadly statements and acts of gang-stalking, defamation and cyberbullying to users, including but not limited to the gang-stalking, defamation and cyberbullying that plaintiff suffered;
 - l) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) that lacked all the necessary safety features to protect users and target victims such as plaintiff;
 - m) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) for which the risks of use far outweigh the utility thereof;
 - n) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) that were unreasonably dangerous for its intended and foreseeable uses and/or misusers and to its intended and foreseeable users and/or target victims, including plaintiff;
 - o) designing, developing, programing, manufacturing, selling, supplying and/or distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”) that promoted the circulation of dangerous and deadly harmful and false statements, including those that led to the gang-stalking, defamation and cyberbullying of plaintiff;

- 1 p) designing, developing, programing, manufacturing, selling, supplying and/or distributing a
2 products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward
3 “points”) that were incapable of preventing the circulation of dangerous and deadly
4 harmful and false statements, including those that led to the gang-stalking, defamation and
5 cyberbullying of plaintiff;
- 6 q) designing, developing, programing, manufacturing, selling, supplying and/or distributing
7 products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward
8 “points”) that recommended dangerous and deadly harmful and false statements, including
9 those that led to the gang-stalking, defamation and cyberbullying of plaintiff;
- 10 r) designing, developing, programing, manufacturing, selling, supplying and/or distributing
11 products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward
12 “points”) that recommended dangerous and deadly harmful and false statements, including
13 those that led to the gang-stalking, defamation and cyberbullying of plaintiff despite
14 knowing that this would lead to severe injury and/or death;
- 15 s) designing, developing, programing, manufacturing, selling, supplying and/or distributing
16 products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward
17 “points”) that were not safe for its intended and represented purposes;
- 18 t) designing, developing, programing, manufacturing, selling, supplying and/or distributing
19 products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward
20 “points”) that intentionally creates user addiction;
- 21 u) designing, developing, programing, manufacturing, selling, supplying and/or distributing
22 products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward
23 “points”) that presents inappropriate, dangerous and/or deadly gang-stalking, defamation
24 and cyberbullying such as the severe harm plaintiff suffered;
- 25 v) designing, developing, programing, manufacturing, selling, supplying and/or distributing
26 products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward
27 “points”) despite having actual knowledge of the dangerous and deadly content and severe
28 harm, including the gang-stalking, defamation and cyberbullying plaintiff suffered,
circulating on their apps and platforms, failing to assess the risks of the products and
adopt available, reasonable and feasible alternatives;
- w) designing, developing, programing, manufacturing, selling, supplying and/or distributing
products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward
“points”) that lacked all the necessary safety features to protect users and target victims,
including plaintiff;
- x) designing, developing, programing, manufacturing, selling, supplying and/or distributing
products (the Facebook, AWDTSO and Daily Mail apps and algorithms and reward
“points”) that malfunctioned by recommending dangerous and deadly statements,
including those facilitated the gang-stalked, defamed and cyberbullying plaintiff;
- y) failing the warn users and target victims of the risks associated with the products (the
Facebook, AWDTSO and Daily Mail apps and algorithms and reward “points”);
- z) failing the warn users and target victims of the risks associated with the dangerous and
deadly statements, including those that facilitated the gang-stalking, defamation and
cyberbullying of plaintiff, circulating on the Facebook, AWDTSO and Daily Mail apps
and algorithms and reward “points” and recommended to users and through their FYP and
via Facebook, AWDTSO and Daily Mail reward “points” offered to them;

- 1 aa) designing, developing, programming, manufacturing, selling, supplying and/or
2 distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and
3 reward “points”) the risks and hazards of which far outweighed any utility or benefit of
4 the products (i.e. in violation of the risk-utility test);
5 bb) designing, developing, programming, manufacturing, selling, supplying and/or
6 distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and
7 reward “points”) that lacked reasonable, available and feasible alternative designs that
8 would have made the products safer for users and target victims, including plaintiff;
9 cc) designing, developing, programming, manufacturing, selling, supplying and/or
10 distributing products (the Facebook, AWDTSO and Daily Mail apps and algorithms and
11 reward “points”) the risks of which were unknown or unknowable to the consumer (i.e. in
12 violation of the consumer expectations test).

13 88. Since on or about 2022 until the present plaintiff was injured by defendants for the
14 above-stated reasons.

15 89. Defendants Facebook, AWDTSO and Daily Mail knew its products would be used by
16 its users without inspection for defects. The products were defective when they left the control of
17 defendants Facebook, AWDTSO and Daily Mail. Said products at the time of injury were being used
18 in the manner intended by defendants Facebook, AWDTSO and Daily Mail.

19 90. Plaintiff was a victim of the above-noted products both as a user as well as a person
20 subject to the world-wide total collective effect of Facebook, AWDTSO and Daily Mail’s unlawful
21 monopolies that boasts billions of users across the world.

22 91. Plaintiff’s injury was the legal and proximate result of strict liability of Facebook,
23 AWDTSO and Daily Mail who created, designed, coded and/or manufactured and/or assembled the
24 above-noted products: the Facebook, AWDTSO and Daily Mail apps, their algorithm(s) and their
25 reward “points” e.g. Facebook reward “points”.

26 92. Plaintiff’s injury was also the legal and proximate result of strict liability of Facebook,
27 AWDTSO and Daily Mail who provided their products to its users and groups and thus users who
28 created Facebook, AWDTSO and Daily Mail groups that include members across the world.

 93. Unless and until enjoined and restrained by order of this court, defendants’ wrongful

1 conduct will continue to cause irreparable harm to plaintiff, entitling him to seek declaratory relief.

2 94. This action, if successful, will enforce an important right affecting public interest and
3 would confer a significant benefit, whether pecuniary or non-pecuniary, for the general public.
4 Because this case is brought for the purposes of enforcing important rights affecting public interest,
5 plaintiff also seeks recovery of attorney's fees and costs in prosecuting this action against defendants
6 under code of civil procedure § 1021.5 and other applicable law.
7

8 **VI.**
9 **SECOND CAUSE OF ACTION**
10 **NEGLIGENCE**
11 *Against All Defendants*

12 95. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
13 they were fully set forth herein.

14 96. Defendants had a duty to design, develop, program, manufacture, distribute, sell,
15 supply and/or operate their app and algorithm and "points" and groups and/or forums such that it did
16 not expose users and/or its target victims to harm and/or injury.

17 97. Defendants had a duty to monitor the content shared, posted and/or circulated
18 on its app and platform and/or group to ensure that dangerous and deadly content were not posted,
19 shared, circulated, recommended and/or encouraged.

20 98. Defendants had a duty to monitor and evaluate the performance of their algorithm
21 and/or points and/or groups and/or forums and ensure that they were not recommending or posting
22 dangerous and deadly content, including, but not limited to the gang-stalking, defamation and
23 cyberbullying of plaintiff.
24

25 99. Defendants had a duty to employ and train personnel to appropriately and reasonably
26 respond to notice that dangerous and deadly content were being posted, shared and/or circulated on
27 defendants' app and/or groups.
28

1 100. Defendants had a duty to protect vulnerable users and or victims of their product,
2 specifically those who were targeted via the above-noted gang-stalking, defamation and
3 cyberbullying.

4 101. Defendants had a duty to design, develop, program, manufacture, distribute, sell,
5 supply and/or operate their app and algorithm and “points” and/or groups and/or forums such that
6 they did not manipulate users and/or otherwise encourage anyone to engage in dangerous and
7 harmful acts.
8

9 102. Defendants had a duty to design, develop, program, manufacture, distribute, sell,
10 supply and/or operate their app and algorithm and “points” and/or groups and/or forums that did not
11 create harmful addiction and dependence among its users.
12

13 103. Defendants had a duty to reasonable research and due their due diligence regarding
14 any and all statements they sought to published regarding plaintiff without defaming him.

15 104. Defendants had a duty to do their due diligence before making any statements and/or
16 representations that falsely and harmfully portray plaintiff in a negative light.
17

18 105. Defendants miserably failed these aforementioned duties and as a result plaintiff was
19 severely harmed.

20 106. Plaintiff is not seeking to hold Facebook liable as the publisher of third-party content
21 and instead intends to hold Facebook as well as AWDTSG and Daily Mail responsible for their
22 independent conduct as the designers, developers, programmers, manufacturers, sellers and/or
23 distributors of their dangerously defective apps and algorithms and reward “points”. Thus plaintiff’s
24 claims fall outside of any potential protections afforded by Section 230(c) of the Communications
25 Decency Act (“CDA”).
26

27 107. The injuries, damages and losses suffered by plaintiff as more fully set forth herein
28

1 were caused by the negligence, gross negligence, carelessness, recklessness and willful and wanton
2 conduct of Facebook, AWDTSO, Daily Mail et al. by and through their agents, servants, workers,
3 contractors, forums, groups, designers, developers, programmers, manufacturers, sellers, marketers,
4 suppliers, distributors, subsidiaries, sister corporations, parent companies, successor corporations
5 and/or predecessor corporations, both personally and in the following particular respects:
6

- 7 a) recommending and/or posting dangerous and severely harmful content, including,
8 but not limited to the gang-stalking, defamation and cyberbullying of plaintiff, to
9 users FYPs;
- 10 b) allowing dangerous and severely harmful content, including but not limited to the
11 gang-stalking, defamation and cyberbullying of plaintiff, to be posted, shared
12 and/or circulated to users on the Facebook, AWDTSO, Daily Mail apps;
- 13 c) creating an algorithm and points that recommended and/or posted dangerous and
14 severely harmful content, including but not limited to the gang-stalking,
15 defamation and cyberbullying of plaintiff, to be posted, shared and/or circulated to
16 hundreds of millions of users on Facebook, AWDTSO and Daily Mail;
- 17 d) failing to prevent dangerous and severely harmful content, including but not
18 limited to the gang-stalking, defamation and cyberbullying of plaintiff, from being
19 posted, shared, and/or circulated to users on the Facebook, AWDTSO, Daily Mail
20 apps despite being actually aware of said publications and despite knowing that
21 such a failure would expose its subjects such as plaintiff to the unreasonable and
22 unacceptable risk of severe injury;
- 23 e) failing to prevent dangerous and severely harmful content, including but not
24 limited to the gang-stalking, defamation and cyberbullying of plaintiff, from being
25 posted, shared, and/or circulated to users on the Facebook, AWDTSO, Daily Mail
26 apps/forums/platforms despite being actually aware of said publications and
27 despite knowing that such a failure would expose its subjects such as plaintiff to
28 the unreasonable and unacceptable risk of severe injury;
- f) intentionally addicting users to the Facebook, AWDTSO, Daily Mail apps;
- g) intentionally addicting users to Facebook, AWDTSO, Daily Mail forums and/or
platforms;
- h) intentionally addicting users to the Facebook, AWDTSO, Daily Mail apps for the
goal of increasing corporate revenues and profits;
- i) intentionally addicting users to the Facebook, AWDTSO, Daily Mail apps for the
goal of increasing profits, including, but not limited to Facebook points;
- j) hiring and/or employing personnel who were unfit, untrained, and/or incapable of
operating and/or managing the Facebook, AWDTSO, Daily Mail apps and their
algorithms and rewards points to ensure that dangerous and severely harmful
content was not posted, shared, or circulated to users on the app;
- k) hiring and/or employing personnel who were unfit, untrained, and/or incapable of
operating and/or managing the Facebook, AWDTSO, Daily Mail apps and their

- 1 algorithms and rewards points to ensure that dangerous and severely harmful
2 content was not posted, shared, or circulated to users on these groups;
- 3 l) failing to adequately train, educate, and/or supervise its employees, contractors,
4 agents, and/or servants such that they were capable of operating and/or managing
5 the the Facebook, AWDTSO, Daily Mail apps and their algorithms and rewards points
6 to ensure that dangerous and harmful content was not posted, shared, or
7 circulated to users on the app;
- 8 m) failing to adequately train, educate, and/or supervise its employees, contractors,
9 agents, and/or servants such that they were capable of operating and/or managing
10 the Facebook, AWDTSO, Daily Mail apps and their algorithms and rewards points
11 to ensure that dangerous and harmful content was not posted, shared, or circulated
12 to users on the groups;
- 13 n) failing to remove dangerous and harmful content from the Facebook, AWDTSO,
14 Daily Mail apps despite knowing that users were being encouraged to engage in
15 dangerous and severely harmful actions and despite knowing that users and
16 persons were being exposed to and actually suffering severe injury, including
17 plaintiff;
- 18 o) failing to remove dangerous and harmful content from the Facebook, AWDTSO,
19 Daily Mail apps despite knowing that users were being encouraged to engage in
20 dangerous and severely harmful actions and despite knowing that users and
21 persons were being exposed to and actually suffering severe injury, including
22 plaintiff;
- 23 p) manipulating and socially programming users to engage in certain desired
24 activities and engagement on the Facebook, AWDTSO, Daily Mail apps in order
25 to maximize corporate revenues and profits;
- 26 q) manipulating and socially programming users to engage in certain desired
27 activities and engagement on the Facebook, AWDTSO, Daily Mail apps n order to
28 maximize profits and points;
- r) developing, enacting, promulgating, and enforcing policies and procedures which
allowed dangerous and severely harmful content and acts, including but not
limited to the gang-stalking, defamation and cyberbullying plaintiff suffered on the
app;
- s) developing, enacting, promulgating, and enforcing policies and procedures which
allowed dangerous and severely harmful content and acts, including but not
limited to the gang-stalking, defamation and cyberbullying that plaintiff suffered
on the group;
- t) developing, enacting, promulgating, and enforcing policies and procedures which
prevented the discovery of dangerous and severely harmful content and acts,
including but not limited to the gang-stalking, defamation and cyberbullying that
plaintiff suffered, that was being posted, shared and circulated to users on the app;
- u) developing, enacting, promulgating, and enforcing policies and procedures which
prevented the discovery of dangerous and severely harmful content and acts,
including but not limited to the gang-stalking, defamation and cyberbullying that
plaintiff suffered, that was being posted, shared and circulated to users on the
group;

- 1 v) developing, enacting, promulgating, and enforcing policies and procedures which
2 prevented the timely takedown of dangerous and severely harmful content and
3 acts, including but not limited to the gang-stalking, defamation and cyberbullying
4 that plaintiff suffered;
- 5 w) developing, enacting, promulgating, and enforcing policies and procedures which
6 resulted in dangerous and severely harmful content and acts, including but not
7 limited to the gang-stalking, defamation and cyberbullying that plaintiff suffered
8 being recommended to users and group members through e.g. their FYP;
- 9 x) failing to prevent harmful content gang-stalking, defaming and cyberbullying
10 plaintiff from being posted, shared, circulated, and/or recommended to users and
11 group members, including that concerning plaintiff, despite knowing that multiple
12 people, including plaintiff, had been several harmed by AWDTSO and the Daily
13 Mail and/or other Facebook posts and publications on said apps and groups;
- 14 y) designing, developing, programming, manufacturing, selling, supplying, and/or
15 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
16 algorithms and rewards points) in a defective condition;
- 17 z) designing, developing, programming, manufacturing, selling, supplying, and/or
18 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
19 algorithms and rewards points) without adequate warnings;
- 20 aa) designing, developing, programming, manufacturing, selling, supplying, and/or
21 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
22 algorithms and rewards points) that were not equipped, programmed with, or
23 developed with the necessary safeguards required to prevent circulation of
24 dangerous and severely harmful content and acts, including but not limited to the
25 gang-stalking, defamation and cyberbullying that plaintiff suffered;
- 26 bb) designing, developing, programming, manufacturing, selling, supplying, and/or
27 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
28 algorithms and rewards points) that were not equipped, programmed with, or
developed with the necessary safeguards required to prevent circulation of
dangerous and severely harmful content and acts, including but not limited to the
gang-stalking, defamation and cyberbullying that plaintiff suffered, despite
knowing that a failure to equip, program, or develop the app, its algorithm, groups
and points with such safeguards would result in severe injury;
- cc) designing, developing, programming, manufacturing, selling, supplying, and/or
distributing products (the Facebook, AWDTSO, Daily Mail apps and their
algorithms and rewards points) that were intended to addict users and manipulate
them into participating in dangerous and severely harmful content and acts,
including but not limited to the gang-stalking, defamation and cyberbullying that
plaintiff suffered;
- dd) designing, developing, programming, manufacturing, selling, supplying, and/or
distributing products (the Facebook, AWDTSO, Daily Mail apps and their
algorithms and rewards points) that were intended to addict users and manipulate
them into participating in dangerous and severely harmful content and acts,
including but not limited to the gang-stalking, defamation and cyberbullying that
plaintiff suffered despite knowing that this would lead to severe injuries to users
and nonusers, including plaintiff;

- 1 ee) designing, developing, programming, manufacturing, selling, supplying, and/or
2 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
3 algorithms and rewards points) that were intended to addict users;
4 ff) designing, developing, programming, manufacturing, selling, supplying, and/or
5 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
6 algorithms and rewards points) that preyed upon the vulnerability of users and/or
7 non-users who were unaware of statements made about on said Facebook groups
8 and Daily Mail platforms and/or unable to join said groups and thus unable to
9 exercise freedom of speech to defend themselves;
10 gg) designing, developing, programming, manufacturing, selling, supplying, and/or
11 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
12 algorithms and rewards points) that were intended to manipulate and/or encourage
13 maximum engagement and/or participation by users and harm to their target
14 victims;
15 hh) designing, developing, programming, manufacturing, selling, supplying, and/or
16 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
17 algorithms and rewards points) that recommended inappropriate, dangerous and
18 severely harmful content and acts to users and members, including but not limited
19 to the gang-stalking, defamation and cyberbullying that plaintiff suffered through
20 users' and members' FYP.
21 ii) designing, developing, programming, manufacturing, selling, supplying, and/or
22 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
23 algorithms and rewards points) which lacked all the necessary safety features to
24 protect users, including plaintiff;
25 jj) designing, developing, programming, manufacturing, selling, supplying, and/or
26 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
27 algorithms and rewards points) for which the risks of use far outweighed the utility
28 thereof;
kk) designing, developing, programming, manufacturing, selling, supplying, and/or
distributing products (the Facebook, AWDTSO, Daily Mail apps and their
algorithms and rewards points) that were unreasonably dangerous for its intended
and foreseeable uses and/or misuses and to its intended and foreseeable users and
their target victims, including plaintiff;
ll) designing, developing, programming, manufacturing, selling, supplying, and/or
distributing products (the Facebook, AWDTSO, Daily Mail apps and their
algorithms and rewards points) that promoted the circulation of dangerous and
severely harmful content and acts to users and members, including but not limited
to the gang-stalking, defamation and cyberbullying that plaintiff suffered;
mm) designing, developing, programming, manufacturing, selling, supplying, and/or
distributing products (the Facebook, AWDTSO, Daily Mail apps and their
algorithms and rewards points) that were incapable of preventing the circulation of
dangerous and severely harmful content and acts to users and members, including
but not limited to the gang-stalking, defamation and cyberbullying that plaintiff
suffered;
nn) designing, developing, programming, manufacturing, selling, supplying, and/or
distributing products (the Facebook, AWDTSO, Daily Mail apps and their

- 1 algorithms and rewards points) that recommended dangerous and severely harmful
2 content and acts to users and members, including but not limited to the gang-
3 stalking, defamation and cyberbullying that plaintiff suffered;
4 oo) designing, developing, programming, manufacturing, selling, supplying, and/or
5 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
6 algorithms and rewards points) that recommended dangerous and severely harmful
7 content and acts to users and members, including but not limited to the gang-
8 stalking, defamation and cyberbullying that plaintiff suffered despite knowing that
9 this would lead to severe injury and/or death;
10 pp) designing, developing, programming, manufacturing, selling, supplying, and/or
11 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
12 algorithms and rewards points) that were not safe for its intended and represented
13 purposes;
14 qq) designing, developing, programming, manufacturing, selling, supplying, and/or
15 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
16 algorithms and rewards points) that intentionally creates user addiction;
17 rr) designing, developing, programming, manufacturing, selling, supplying, and/or
18 distributing products (the Facebook, AWDTSO, Daily Mail apps and their
19 algorithms and rewards points) that presents inappropriate, dangerous and/or
20 severely harmful content and acts to users and members, including but not limited
21 to the gang-stalking, defamation and cyberbullying that plaintiff suffered on users'
22 FYP;
23 ss) despite having actual knowledge of dangerous and severely harmful content and
24 acts, including but not limited to the gang-stalking, defamation and cyberbullying
25 that plaintiff suffered, circulating their platforms, groups, forums and apps and via
26 their reward points, said gang-stalking, defamation and cyberbullying causing
27 serious injuries and/or deaths, failing to assess the risks of the products and adopt
28 available, reasonable, and feasible alternatives;
tt) designing, developing, programming, manufacturing, selling, supplying, and/or
distributing products (the Facebook, AWDTSO, Daily Mail apps and their
algorithms and rewards points) that lacked all the necessary safety features to
protect users and target victims, including plaintiff;
uu) designing, developing, programming, manufacturing, selling, supplying, and/or
distributing products (the Facebook, AWDTSO, Daily Mail apps and their
algorithms and rewards points) that malfunctioned by recommending dangerous
and severely harmful content and acts, including but not limited to the gang-
stalking, defamation and cyberbullying that plaintiff suffered, to users and
members;
vv) failing to warn users and target victims of the risks associated with the products
(the Facebook, AWDTSO, Daily Mail apps and their algorithms and rewards
points);
ww) failing to warn users of the risks associated with dangerous and severely
harmful content and acts, including but not limited to the gang-stalking,
defamation and cyberbullying that plaintiff suffered circulating the Facebook,
AWDTSO, Daily Mail apps, their groups and recommended to users through their
FYPs;

108. As noted above, during 2023 and since plaintiff began to obtain evidence of a cyber-attack on his person including defamatory claims that include, but are not limited to the following statements:

- a) an anonymous Facebook account stated that “[p]ublic records show [that] he [plaintiff] has several domestic violence charges filed against him plus involvement in [a] MURDER case of his ex wife” that plaintiff “is DANGEROUS”; and that plaintiff “[f]iled 11 court cases against women in 33 months trying to extort money from them”;
- i) Gibbons stated that plaintiff “pressed lawsuits against a number of women to extort money from them and was suspected in the murder of his ex[-]wife”; that plaintiff engages in “extortion lawsuits”; is under “murder suspicion” – presumably for murdering his girlfriend who passed from cancer in 2018 –; that plaintiff is guilty of “fraudulent behavior”, “using a false identity”, “posing a significant risk of attempting to obtain money from other users through deceitful means”, is “suing a company that catches cheaters and the suspicion of murdering his wife?! Dateline vibes”, that plaintiff is “obviously a predator”, whose Ph.D from Yale University is fraudulent;
- j) an anonymous group member stated plaintiff “killed” his “ex”; that plaintiff has committed “crimes!”; that plaintiff “said he was an [a]ttorney”; and that the online dating app “[H]inge” banned him “for fraudulent behavior”;
- k) Blalock stated that “I’m afraid if there’s any missing women in LA – he [plaintiff] has something to do with it” and that “[h]e [plaintiff] [i]s going to end up on Dateline one day.”
- l) Shariat stated that plaintiff aggressively stalked her via her Instagram posts and finally tracked her down at a hotel in Beverly Hills whereat plaintiff grabbed her wrist violently and acted so harassingly that even years later Shariat is unable to sleep and still wakes up in terror;
- m) Vanderford stated that plaintiff is an “abusive murderer”; that he has acted “Fraudulent”; that “He is truly dangerous”; and Vanderford posted statements that “[p]ublic records show [that] he [plaintiff] has several domestic violence charges filed against him plus involvement in [a] MURDER case of his ex wife” that plaintiff “is DANGEROUS”; and that plaintiff “[f]iled 11 court cases against women in 33 months trying to extort money from them”;
- n) Wiz stated that plaintiff was “a murder suspect” and that “exes has accused him of ‘stds’”;
- o) and Rodriguez stated that plaintiff was “on the ca [California] court[’s] listing” because “He’s been labeled a vexatious litigator”.

109. All of the above-noted statements are false. Plaintiff has never been charged, much

1 less convicted of any crime his entire life. In fact, plaintiff is well-known for being an honest and fair
2 person. Plaintiff properly obtained a Ph.D from Yale University in 2011 before going on to write and
3 publish several books and articles recognized by leading scholars around the world such as Noam
4 Chomsky who celebrates plaintiff's works on the backs of plaintiff's books. Plaintiff's writings are
5 available at libraries of universities and colleges world-wide and within multiple fields and specialties
6 of scholarship from ancient history, early historic periods, classical Greece, philosophy, poetry,
7 literature, politics, religion, modern history, etc. After contacting Facebook which failed to respond
8 whatsoever plaintiff filed LAPD and FBI reports and a lawsuit in 2023 to bring these evil-doers to
9 justice (see LASC case no. 23STCV14890).

11 110. After serving some of the defendants from said 2023 lawsuit (LASC case no.
12 23STCV14890) and initiating early forms of litigation an anonymous organizer, Valdes, Burger,
13 Gibbons, Blalock, Shariat and Rodriguez published a GoFundMe webpage on 7 February 2024:
14 <https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles> whereupon they
15 published Shariat's defamatory statements that plaintiff stalked and harassed Shariat at a hotel in
16 Beverly Hills. These statements are also false and defendants unjustly enriched themselves by
17 obtaining thousands of dollars from said harmful defamation. Defendants then went on national and
18 international news media outlets promoting their GoFundMe webpage and said defamatory
19 statements to billions of viewers.

22 111. At approximately the same time in early April 2024 *The Daily Mail* published a litany
23 of articles about plaintiff all misrepresenting him as a stalker and committing various other crimes:

- 25 a) In his Daily Mail article from 13 April 2024: **"The world's most vilified man
26 speaks for the first time: An online female hate-mob has accused him of
27 stalking, extortion and MURDER. But, we reveal, there are also dark episodes
28 in his past..."**⁶ Sheridan states that plaintiff was **"involved in his wife's death"** and
tht he was **arrested for being "involved in his wife's death"**. This is false.

⁶ <https://www.dailymail.co.uk/news/article-13305141/stewart-lucas-murrey-sue-women-social-media.html>

Sheridan quotes Kartherine Anthony-Poer saying plaintiff dated her daughter and stalked her. **“He stalked her, followed her and would show up at her house.”** This is false. Sheridan states: **“he [plaintiff] revealed that police had indeed suspected him of murder.”** This is false. Probate attorneys lied unlawfully in court starting a rumor that plaintiff had been arrested for murder. Plaintiff then sued the police and reasonably suspected as much. However, after six (6) depositions plaintiff confirmed that the subject-arrest arrest for which he was never charged regarded only the issue of forgery. The dirty police involved were sued and this case settled in plaintiff’s favor. Sheridan never asked plaintiff about any of this prior to this publication though he had the opportunity to email him. Sheridan states: **“His case was dismissed by the court in May 2020, receiving no damages.”** This is false. Plaintiff significantly received monetary compensation for this settlement. Sheridan states while citing an anonymous source: **“‘This man attempted to destroy my life and my family,’ said the woman, who asked not to be identified publicly. She dated him for a year and after the break-up, she sought to warn other women about him in an online forum. She added: ‘He dragged me to court for two years after dating and slapped me with at least 12 separate lawsuits which were settled before trial.’”** This is also all false, to say nothing of the fact that it is absurd to state that plaintiff sued one person 12 separate times. Sherdian states: **“A similar suit followed against CheaterReport.com, a website that encouraged users to report a cheating wife, husband, boyfriend or girlfriend. The case was dismissed two months later when the Los Angeles Superior Court ruled that it lacked jurisdiction.”** This is false. Plaintiff’s Cheaterreport case went on for years and exposed Facebook working with Cheaterreport and the national security state. This article also posted plaintiff’s private texts and pictures of him where he is accompanied by an individual serving papers. Plaintiff was legally and properly serving his lawsuit to Gibbons and doing research on her address. But this article misrepresents the images to suggest that plaintiff was stalking Gibbons. Sheridan also refers to websites like AWDTSG and Cheaterreport as platforms for reasonable critiques of people. This is a misrepresentation. Evidence suggests said platforms are psychological operations to target innocent victims like plaintiff. Sheridan states that plaintiff’s case against Poer was dismissed, thus also misrepresents the fact that plaintiff settled his case against Poer and all related cases to it in his favor. It is clear Sheridan intended to harm plaintiff naming him **“The world's most vilified man [who has] dark episodes in his past...”**

- b) In his Daily Mail article from 12 April 2024: **“The bachelor who sued 50 women for calling him a bad date turned up at one of their homes even - though she didn't give him her address - after she discovered online group that exposed him”**⁷ Bates sets up the false image that plaintiff was stalking Gibbons. Bates’ title further states that plaintiff is suing women “for calling him a bad date”. This is false. Bates’ title further suggest that said Facebook AWDTSG group “exposed him” i.e. his criminal nature or his threat to all of womankind. This is false. Bates never contacted plaintiff nor did any due diligence regarding any of these issue. Bates states: **“Stewart Lucas Murrey went to the Los Angeles home of Kelly**

⁷ <https://www.dailymail.co.uk/news/article-13301999/The-bachelor-sued-50-women-calling-bad-date-turned-one-homes-didnt-address-discovered-online-group-exposed-him.html>

1 **Gibbons at 10.45pm and returned again days later at 8.45pm**” again making a
2 harmful representation out of context. Bates’ malicious misrepresentations continue.
3 “Stewart Lucas Murrey went to the Los Angeles home of Kelly Gibbons at 10.45pm
4 and returned again days later at 8.45pm. [...] CCTV images from the property
5 appear to show him filming or taking photos on his mobile phone.” Bates also states:
6 “Stewart Lucas Murrey, the Los Angeles bachelor who unsuccessfully sued 50
7 women for putting his womanizing ways on blast.” This is false. Plaintiff is
8 successfully sued the majority of these women presently and his case against them
9 was never unsuccessful. This article also posted plaintiff’s private texts and pictures
10 of him where he is accompanied by an individual serving papers. Plaintiff was
11 legally and properly serving his lawsuit to Gibbons and doing research on her
12 address. But this article misrepresents the images to suggest that plaintiff was
13 stalking Gibbons.

- 14 c) In his Daily Mail article from 10 April 2024: **“Men set up rival to the ‘Are we
15 Dating the Same Guy?’ Facebook group that exposes cheating partners - as
16 experts warn anyone posting anonymously could still be unmasked”**⁸ Parashar
17 states: “Stewart Lucas Murrey, from Santa Monica, alleged that he was subject to a
18 barrage of false and defamatory posts and comments on the forum. But his case was
19 dismissed by a judge”. This is false. Plaintiff’s case continues and is stronger than
20 ever. Parashar conflates the entirety of plaintiff’s lawsuit against well over twenty
21 (20) defendants with one single defendant who has been dismissed: “However, on
22 Tuesday afternoon a judge dismissed the lawsuit, ruling in favour of Vanessa
23 Valdez”. This misrepresentations continues: “The women argued they had done
24 nothing wrong by posting their personal opinions in a private online group on social
25 media.” In fact, because he is intentionally obfuscating the reality that my case is not
26 dismissed, the crack journalist for the Daily Smell even invents a new grammatical
27 mistake to confuse and manipulate his readers to harm plaintiff further: “The judge
28 found no evidence of conspiracy on **the women's part** and granted an Anti-SLAPP
motion - which protects those who speak out on matters of public interest against
abusive lawsuits made to silence them.” (emphasis added) Because Parashar
intentionally seeks to misrepresent that ALL of plaintiff’s defendants have been
dismissed instead of just one of more than twenty, he miswrites: **“women’s”**. This
article also posted plaintiff’s private texts and pictures of him where he is
accompanied by an individual serving papers. Plaintiff was legally and properly
serving his lawsuit to Gibbons and doing research on her address. But this article
misrepresents the images to suggest that plaintiff was stalking Gibbons.
- d) In her Daily Mail article from 9 April 2024: **“Judge dismisses a \$2.6 million claim
by a bachelor, 32, against dozens of women who mocked him for being a ‘bad
date’ in a viral Facebook group: ‘They did nothing wrong’”**⁹ Pedler also
misrepresents that plaintiff’s lawsuit has been dismissed in her title and when she
states: “The judge also reportedly found that based on the evidence presented, the
court did not see any possibility of Murray winning against the defendants on any
claim he made.” This is false. The judge made no such statement.

⁸ <https://www.dailymail.co.uk/news/article-13291977/Fight-against-women-naming-shaming-bad-exes.html>

⁹ <https://www.dailymail.co.uk/news/article-13287847/Judge-dismisses-defamation-lawsuit-brought-LA-bachelor-against-50-women-discovered-discussing-Facebook-group-called-dating-guy.html>

1 e) In her Daily Mail article from 21 March 2024: **“LA bachelor launches**
2 **LAWUIT against more than 50 female members of controversial Facebook**
3 **group that ‘exposes’ unfaithful men over claims they wrongfully branded him a**
4 **MURDERER who had STIs in scathing online posts”**¹⁰ Saunt states in title and
5 her article that AWDTSO innocently exposes cheating and harmful men: She
6 states: “The lawsuit stems from the social media group, which currently has more
7 than 52,500 members, **where daters issue warnings about potentially harmful or**
8 **deceitful men”** (emphasis added). This is false. AWDTSO is not an innocent group
9 that only “issue[s] warnings about potentially harmful or deceitful men”.

10 112. Along with failing to properly do its and their due diligence, *The Daily Mail* quoted
11 anonymous sources and one Katherine Poer-Anthony who stated on or before 13 April 2024 to the
12 Daily Mail that plaintiff had stalked her daughter. Anthony-Poer stated: **“He stalked her, followed**
13 **her and would show up at her house.”** This is all false.

14 113. On or about 12 April 2024 Valdes filed a police report against plaintiff wherein
15 Valdes claimed that plaintiff had “doxed” her i.e. electronically harassed her by posting harmful
16 information online (California Penal Code § 653.2). This is false. Valdes further harassed plaintiff by
17 filing a restraining order petition against plaintiff whose trial-hearing denied Valdes’ petition on 11
18 July 2024.

19 114. As a result of the above-noted intentional and malicious defamation, in particular
20 in regard to the false stories about stalking, plaintiff has been the subject of and received death
21 threats. Anonymous Facebook users also initiated and operated accounts impersonating and harassing
22 plaintiff. Other anonymous users such as “Holden_Guardian_Co” on Reddit.com claimed that
23 plaintiff suffers from psychological disorders such as autism. This is false.

24 115. By conducting themselves as set forth above, the defendants acts and/or omissions
25 were a substantial factor in, a factual cause of, and/or increased the risk of harm that caused plaintiff
26 injuries.

27 116. By reason of the defendants’ carelessness, negligence, gross negligence, recklessness,
28

¹⁰ <https://www.dailymail.co.uk/femail/article-13224259/are-dating-guy-la-sues-women-murderer.html>

1 and willful and wanton conduct, by and through their agents, servants, workers, contractors,
2 designers, developers, programmers, manufacturers, sellers, marketers, suppliers, distributors,
3 subsidiaries, sister corporations, parent companies, successor corporations and/or predecessor
4 corporations, plaintiff was caused to sustain severe and permanent injuries as set forth above.
5

6 117. The safety of the public and the users and subjects of the Facebook, AWDTSO, Daily
7 Mail platforms, apps and their algorithms and rewards points, particularly their target-victims who
8 were never given notice nor able to join said groups to defend themselves, must come first and be the
9 paramount concern and consideration in the design, development, programming, supply, and
10 distribution of defendants' platforms, apps, algorithms, groups and "points" as well as in the
11 operation, oversight, supervision, and management of the platforms, apps, algorithms, groups and
12 "points" and the content available, posted, shared, and/or recommended to users on the platforms,
13 apps, algorithms, groups and distribution of points.
14

15 118. Outrageously, the defendants knowingly exposed the public to addiction,
16 manipulation, and control causing them to promote, engage, and participate in dangerous and
17 severely harmful acts, including but not limited to the gang-stalking, defamation and cyberbullying
18 that plaintiff suffered, all in the name of greater corporate profits.
19

20 119. Outrageously, the defendants knowingly made false statements to harm plaintiff
21 without doing any due diligence whatsoever.
22

23 120. The defendants knew that their dangerous and severely harmful acts, including but not
24 limited to their false statements, gang-stalking, defamation and cyberbullying that plaintiff suffered
25 were circulating on its websites, publications, apps and in its groups and being recommended to users
26 by defendants' algorithm and points on users' FYPs but failed to take appropriate, reasonable, timely,
27 and necessary remedial actions.
28

1 121. The defendants knew that innocent people such as plaintiff were target-victims of its
2 publications, websites, apps, algorithms, groups and “points” in the dangerous and severely harmful
3 acts, including but not limited to the defamation, gang-stalking, defamation and cyberbullying that
4 plaintiff suffered, that defendants’ algorithm, groups and points were recommending to them and
5 promoting through the users’ FYPs but failed to take appropriate, reasonable, timely, and necessary
6 remedial actions.
7

8 122. The defendants outrageously prioritized revenues and profits over the health and
9 safety of its users, particularly its innocent target-victims such as plaintiff.
10

11 123. Defendants pursuant to the common law of the state of California and as codified in
12 Cal. Civ. Code §1714 were under a duty through the exercise of ordinary care and caution to refrain
13 from causing damage and injury to persons who came into contact with them and their product(s),
14 groups, et. seq. including plaintiff.

15 124. As the actual and proximate result of the defective product(s), groups, their
16 distribution of points and rewards and the above-noted defamation, in particular the gang-stalking,
17 defamation and cyberbullying they promoted to billions of users and viewers, plaintiff suffered
18 emotional, mental and physical harm, post-traumatic stress syndrome, mortification and grief.
19

20 125. Plaintiff has had to hire and retain physicians, a psychiatrist and health care
21 professionals to treat plaintiff for the psychological and physical harm he has suffered at the hands of
22 and by the negligent acts of defendants.
23

24 126. Plaintiff has suffered medical special damages and incurred medical bills and has
25 suffered general damages of fright, pain, grief, mortification and harm, all in amounts to be proven at
26 the time of the trial herein.

27 127. Unless and until enjoined and restrained by order of this court, defendants’ wrongful
28

1 conduct will continue to cause irreparable harm to plaintiff, entitling him to seek declaratory relief.

2 128. This action, if successful, will enforce an important right affecting public interest and
3 would confer a significant benefit, whether pecuniary or non-pecuniary, for the general public.
4 Because this case is brought for the purposes of enforcing important rights affecting public interest,
5 plaintiff also seeks recovery of attorney's fees and costs in prosecuting this action against defendants
6 under code of civil procedure § 1021.5 and other applicable law.
7

8 **VII.**
9 **THIRD CAUSE OF ACTION**
10 **VIOLATION OF BUS. AND PROF. § 17200**
11 *Against Defendants Facebook, AWDTSB and Daily Mail*

12 129. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
13 they were fully set forth herein.

14 130. California's unfair competition law "is a notoriously broad statute." (*Flamingo Indus.*
15 *(USA) Ltd. v. United States Postal Service* (9th Cir. 2002) 302 F3d 985). Section 17200 provides: "As
16 used in this chapter, unfair competition shall mean and include any unlawful, unfair or fraudulent
17 business act or practice and unfair, deceptive, untrue or misleading advertising and any act prohibited
18 by Chapter 1 (commencing with § 17500) of Part 3 of Division 7 of the Business and Professions
19 Code."
20

21 131. Each part of § 17200's definition of unfair competition operates separately from each
22 other part. "The statute [section 17200] imposes *strict liability*. It is not necessary to show that the
23 defendant intended to injure anyone." (*Community Assisting Recovery, Inc. v. Aegis Security Ins. Co.*
24 (2001) 92 CA4th 886, 891, 112 CR2d 304, 308).

25 132. Plaintiff alleges legislation passed into law in California must be vetted and approved
26 by 40 senators and 80 representatives and signed into law by the governor. The legislature generally
27 imposes strict liability when it determines that the defendant party is best positioned to prevent
28

1 consumers from being injured by unlawful, unfair, or fraudulent business acts or practices and from
2 deceptive, untrue, or misleading advertising.

3 133. “Act” or “Practice” in General: Practice generally means “the ‘habitual doing of
4 certain things, the doing of an act more than once’ ... [or] ‘[r]epeated or customary action, habitual
5 performance; a succession of acts of similar kind; habit, custom [...]’” (*Wilson v. Stearns* (1954) 123
6 CA2d 472, 479, 267, P2d 59, 65).

8 134. The California Supreme Court has held that “a court of equity may exercise the full
9 range of its inherent powers in order to accomplish complete justice between the parties, restoring if
10 necessary the status quo ante as nearly as may be achieved.” (*People v. Sup.Ct. (Jayhill Corp.)* (1973)
11 9 C3d 283, 286, 107 CR 192, 194).

13 135. As stated above, defendants intentionally caused harm to plaintiff: the gang-stalking,
14 defamation and cyberbullying he suffered to increase web-traffic and advertising and other forms of
15 revenue and profit. In particular, defendants failed to inform or give notice to plaintiff about the harm
16 that they knew had been caused to him while, at the same time, they profited from said harm, thus
17 making their ability to compete with other businesses while having said advantage unfair and
18 unlawful. In said capacity defendants engaged in an unlawful, deceptive and unfair trade practice that
19 has injured plaintiff and other similarly situated citizens.
20

21 136. In particular, defendants designed, developed, program, manufactured, distributed,
22 sold, supplied and/or operated their platforms, websites, apps, algorithms, groups, and rewards such
23 as their “points” to earn profits while they knew said practices severely injured plaintiff.
24

25 137. Further, defendants shared, posted, recommended and/or circulated harmful content
26 about plaintiff on its apps and platforms and/or groups and through rewards such as their “points” to
27 increase their profits.
28

138. Further, defendants manipulated users and caused users to become addicted in furtherance of their profits from said harmful content about plaintiff on its apps and platforms and/or groups and through rewards such as their “points”.

139. Plaintiff does not seek to hold defendant Facebook liable as the speaker or publisher of third-party content and instead intends to hold Facebook as well as AWDTSO and Daily Mail responsible for their own independent conduct as the designers, programmers, manufacturers, sellers and/or distributors of their dangerously defective social media products and for their own independent acts of negligence, gross negligence, carelessness, recklessness and willful and wanton conduct as further described herein. Thus, plaintiff's claim falls outside of any potential protections afforded by section 230(c) of the Communications Decency Act ("CDA").

140. Unless and until enjoined and restrained by order of this court, defendants' wrongful conduct will continue to cause irreparable harm to plaintiff, entitling him to seek declaratory relief.

141. This action, if successful, will enforce an important right affecting public interest and would confer a significant benefit, whether pecuniary or non-pecuniary, for the general public. Because this case is brought for the purposes of enforcing important rights affecting public interest, plaintiff also seeks recovery of attorney's fees and costs in prosecuting this action against defendants under code of civil procedure § 1021.5 and other applicable law.

VIII.
FOURTH CAUSE OF ACTION
VIOLATION OF CALIFORNIA CONSUMER LEGAL REMEDIES ACT
CAL. CIV. § 1750, *et seq.*
Against Defendants Facebook, AWDTSO and Daily Mail

142. Plaintiff incorporates all allegations of this complaint and re-alleges them as though they were fully set forth herein.

143. As corporations or other business entities headquartered in and operating out of the

1 State of California, defendants Facebook, AWDTSO and The Daily Mail were required to comply
2 with the California Consumer Legal Remedies Act, Cal. Civ. § 1750, *et seq.*

3 144. At all times relevant hereto, defendants Facebook, AWDTSO and The Daily Mail
4 intended and expected that their products (their apps, platforms, websites, algorithms, forums and
5 reward points) would be marketed, sold, downloaded, and/or used in the State of California.
6

7 145. Defendants Facebook, AWDTSO and The Daily Mail designed, developed,
8 programmed, manufactured, distributed, sold, supplied, and/or operated their products for sale and
9 use in the U.S., including California.

10 146. At all times relevant hereto, the defendants were persons within meaning of Cal. Civ.
11 Code § 1761(c).
12

13 147. At all times relevant hereto, the plaintiff was a person within meaning of Cal. Civ.
14 Code § 1761(c).

15 148. The California Consumer Legal Remedies Act, Cal. Civ. § 1770(a)(5); (7), provides in
16 pertinent part:

17 The following unfair methods of competition and unfair or deceptive acts or practices
18 undertaken by any person in a transaction intended to result or that results in the sale or lease
19 of goods or services to any consumer are unlawful: Representing that goods or services have
20 sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not
21 have or that a person has a sponsorship, approval, status, affiliation, or connection that he or
22 she does not have [...] Representing that goods or services are of a particular standard,
23 quality, or grade, or that goods are of a particular style or model, if they are another.

24 149. At all times relevant hereto, defendants had both constructive and actual knowledge
25 that when defendants' products were used in a manner that was intended or directed by or reasonably
26 foreseeable to, and was known to or foreseen by defendants, they were used by consumers and
27 targeted victims, including plaintiff, to engage in risky and dangerous activities that were promoted
28

1 and disseminated by defendants' products which sought to encourage such engagement and it was
2 likely that significant injuries, including gang-stalking, defamation and cyberbullying, would occur.

3 150. At all times relevant hereto, defendants had both constructive and actual knowledge
4 that defendants' websites, platforms, apps, algorithms, groups and reward points were resulting in
5 dangerous and severely harmful acts and that said apps, algorithms, groups and points were
6 encouraging users to engage in risky and dangerous activities likely to causes significant injuries,
7 including but not limited to the gang-stalking, defamation and cyberbullying that plaintiff suffered,
8 despite these dangers being concealed from said consumers and their target victims such as a plaintiff
9 and despite defendants' products being marketed and sold as safe.
10

11 151. From the first date on which the defendants placed their products (the Facebook,
12 AWDTSG and Daily Mail apps, their algorithms, groups and reward points) into the stream of
13 commerce for use in California through present, defendants engaged in unfair or deceptive acts or
14 practices, in violation of the California Consumer Legal Remedies Act, including but not limited to
15 deception, fraud, false pretense, false promise, misrepresentation or the concealment, suppression, or
16 omission of material facts, in designing, developing, programming, manufacturing, selling,
17 marketing, supplying, and/or distributing Defendants' products for use in California and elsewhere in
18 the U.S., in that defendants:
19
20

- 21 a) concealed, suppressed, or omitted to disclose that defendants' products were
22 designed and intended to addict users, including users who profited, like
23 Facebook, AWDTSG and Daily Mail from the harm they caused their target
24 victims;
- 25 b) concealed, suppressed, or omitted to disclose that defendants' products carried a
26 risk of addiction and dependence and the thus increased the severe harm caused to
27 their target victims;
- 28 c) concealed, suppressed, or omitted to disclose that defendants' products were
designed and intended to urge and/or compel users to spend as much time as
possible on the Facebook app, thus compounding the serve harm caused to their
target victims;

- d) concealed, suppressed, or omitted to disclose that defendants' products would expose users to dangerous and harmful content that encouraged, promoted and/or prompted users to engage in risky and dangerous activities, including, but not limited to the gang-stalking, defamation and cyberbullying of plaintiff;
- e) concealed, suppressed, or omitted to disclose that defendants' products were not safe or suitable for use by persons with the mentality of a child and/or mentally disorder and/or illness and therefore compounding the serve harm caused to their target victims since its users who harmed plaintiff such as Gibbons are proven victims of psychological disorders;
- f) concealed, suppressed, or omitted to disclose that the risk and dangerous activities, including, but not limited to the gang-stalking, defamation and cyberbullying of plaintiff, shown to users by defendants' products would result in severe injury;
- g) concealed, suppressed, or omitted to disclose that defendants' products would reward users for engaging in risky and dangerous activities;
- h) concealed, suppressed, or omitted to disclose that defendants' products, namely their apps' algorithms, groups and reward points, had not been adequately developed, refined, and/or tested to ensure that dangerous activities, including, but not limited to the gang-stalking, defamation and cyberbullying of plaintiff, would not be disseminated or promoted on the app or otherwise shown to users;
- i) concealed, suppressed, or omitted to disclose that defendants' products, namely the apps' algorithms, groups and points, had not been adequately developed, refined, and/or tested to ensure that users e.g. those with mental disorders would not harm other users and/or victims by showing them harmful content about plaintiff that encouraged and/or prompted said users to engage in dangerous and/or harmful activities or which otherwise created a system which rewarded users for engaging in said dangerous and/or harmful activities; and
- j) concealed, suppressed or omitted to disclose that defendants' corporate profits depended on user addition and maximizing a user's time spend on and engaging in defendants' products and thus compounding the serve harm caused by users to other users and/or their victims.

152. These acts and practices of defendants and those with whom they were acting in concert in designing, developing, programming, manufacturing, distributing, selling, supplying, and/or operating their products (the Facebook, AWDTSO and Daily Maill apps, their algorithms, groups and reward points) for sale and use in California, and elsewhere in the U.S., were unfair because they offended public policy, were immoral, unethical, oppressive, and unscrupulous, and caused substantial injury to consumers and their target victims, including plaintiff.

153. These acts and practices of defendants in designing, developing, programming,

1 manufacturing, distributing, selling, supplying, and/or operating their products (the Facebook,
2 AWDTSO and Daily Mail apps, their algorithms, groups and points) for sale and use in California,
3 and elsewhere in the U.S., were likely to cause substantial injury and/or death to users and their target
4 victims, including plaintiff, by exposing them to and encouraging them to engage in activities which
5 posed unnecessary and unreasonable risks to their health and safety.
6

7 154. These acts and practices of defendants in designing, developing, programming,
8 manufacturing, distributing, selling, supplying, and/or operating their products (the Facebook,
9 AWDTSO and Daily Mail apps, their algorithms, groups and points) for sale and use in California,
10 and elsewhere in the U.S., were likely to cause, and did cause, substantial injury and/or death to users
11 and/or the victims of defendants' products, including plaintiff, in that but for these acts and practices,
12 defendants' products would not have been downloaded, purchased, and/or used in California and
13 persons who used them and/or who were the target victims of those who used them, including
14 plaintiff, would not have been severely injured by said use.
15

16 155. These acts and practices of defendants in designing, developing, programming,
17 manufacturing, distributing, selling, supplying, and/or operating their products (the Facebook,
18 AWDTSO and Daily Mail apps, their algorithms, groups and points) for sale and use in California,
19 and elsewhere in the U.S., committed these acts and engaged in these practices in conscious disregard
20 of the safety of others and their users and the target victims of their users, including plaintiff.
21

22 156. The injuries caused by defendants' acts and practices in designing, developing,
23 programming, manufacturing, distributing, selling, supplying, and/or operating their products (the
24 Facebook, AWDTSO and Daily Mail apps, their algorithms, groups and points) for sale and use in
25 California, and elsewhere in the U.S. – namely, users' injuries and damages (including monetary
26 losses)—are not outweighed by any countervailing benefit to consumers or competition.
27
28

1 157. The Defendants intended that purchasers and/or users of their products use them in
2 reliance on these unfair and deceptive acts and practices.

3 158. The facts that the defendants concealed, suppressed, and/or omitted to disclose were
4 material to the decisions to use defendants' products, and plaintiff would never have been the victim
5 of severe gang-stalking, defamation and cyberbullying not would he have ever used said products had
6 these facts been disclosed.

7
8 159. The defendants' unfair and deceptive acts and practices occurred in connection with
9 their conduct of trade and commerce in California, and elsewhere in the U.S.

10 160. The defendants' unfair and deceptive acts and practices of the defendants violated the
11 California Consumer Legal Remedies Act.

12
13 161. The Defendants committed these unfair and deceptive practices knowing they created
14 a substantial risk of harm to those who used and/or were the target victims of defendants' products in
15 California, and elsewhere in the U.S.

16 162. Plaintiff does not seek to hold Facebook liable as the speaker or publisher of third-
17 party content and instead intends to hold Facebook, AWDTSO and the Daily Mail responsible for
18 their own independent conduct as the designers, programmers, manufacturers, sellers and/or
19 distributors of their dangerously defective social media products and for their own independent acts
20 of deception and deceptive conduct as further described herein. Thus, plaintiff's claim falls outside of
21 any potential protections afforded by section 230(c) of the Communications Decency Act ("CDA").
22

23 163. Unless and until enjoined and restrained by order of this court, defendants' wrongful
24 conduct will continue to cause irreparable harm to plaintiff, entitling him to seek declaratory relief.

25
26 164. This action, if successful, will enforce an important right affecting public interest and
27
28

1 would confer a significant benefit, whether pecuniary or non-pecuniary, for the general public.
2 Because this case is brought for the purposes of enforcing important rights affecting public interest,
3 plaintiff also seeks recovery of attorney's fees and costs in prosecuting this action against defendants
4 under code of civil procedure § 1021.5 and other applicable law.

5
6 165. As a direct and proximate result of defendants' violations of the California Consumer
7 Legal Remedies Act, plaintiff suffered grievous injury and suffered all of the damages discussed and
8 claimed herein.

9 166. WHEREFORE, plaintiff claims of defendants, Facebook, AWDTSO and Daily Mail,
10 jointly and severally, sums in excess of the jurisdictional threshold in damages recoverable under the
11 California Consumer Legal Remedies Act, as well as, compensatory damages, punitive damages,
12 delay damages, interest and allowable costs of suit and brings this action to recover same.
13

14 **IX.**
15 **FIFTH CAUSE OF ACTION**
16 **DEFAMATION – LIBEL**

17 *Against Defendants The Daily Mail, Sheridan, Bates, Pedler, Parashar, Saunt, Katherine Poer-*
18 *Anthony, Anonymous organizer, Gibbons, Shariat, Vanderford, Blalock, Burger, Valdes, Wiz,*
19 *Rodriguez, Anonymous Facebook account and "Holden_Guardian_Co"*

20 167. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
21 they were fully set forth herein.

22 168. As noted above, during 2023 and since plaintiff began to obtain evidence of a
23 cyber-attack on his person including defamatory claims that include, but are not limited to the
24 following statements:

- 25 a) an anonymous Facebook account stated that "[p]ublic records show [that] he
26 [plaintiff] has several domestic violence charges filed against him plus
27 involvement in [a] MURDER case of his ex wife" that plaintiff "is
28 DANGEROUS"; and that plaintiff "[f]iled 11 court cases against women in 33
months trying to extort money from them";
b) Gibbons stated that plaintiff "pressed lawsuits against a number of women to
extort money from them and was suspected in the murder of his ex[-]wife"; that

- 1 plaintiff engages in “extortion lawsuits”; is under “murder suspicion” –
2 presumably for murdering his girlfriend who passed from cancer in 2018 –; that
3 plaintiff is guilty of “fraudulent behavior”, “using a false identity”, “posing a
4 significant risk of attempting to obtain money from other users through deceitful
5 means”, is “suing a company that catches cheaters and the suspicion of murdering
6 his wife?! Dateline vibes”, that plaintiff is “obviously a predator”, whose Ph.D
7 from Yale University is fraudulent;
8 c) an anonymous group member stated plaintiff “killed” his “ex”; that plaintiff has
9 committed “crimes!”; that plaintiff “said he was an [a]ttorney”; and that the online
10 dating app “[H]inge” banned him “for fraudulent behavior”;
11 d) Blalock stated that “I’m afraid if there’s any missing women in LA – he [plaintiff]
12 has something to do with it” and that “[h]e [plaintiff] [i]s going to end up on
13 Dateline one day.”
14 e) Shariat stated that plaintiff aggressively stalked her via her Instagram posts and
15 finally tracked her down at a hotel in Beverly Hills whereat plaintiff grabbed her
16 wrist violently and acted so harassingly that even years later Shariat is unable to
17 sleep and still wakes up in terror;
18 f) Vanderford stated that plaintiff is an “abusive murderer”; that he has acted
19 “Fraudulent”; that “He is truly dangerous”; and Vanderford posted statements that
20 “[p]ublic records show [that] he [plaintiff] has several domestic violence charges
21 filed against him plus involvement in [a] MURDER case of his ex wife” that
22 plaintiff “is DANGEROUS”; and that plaintiff “[f]iled 11 court cases against
23 women in 33 months trying to extort money from them”;
24 g) Wiz stated that plaintiff was “a murder suspect” and that “exes has accused him of
25 ‘stds’”;
26 h) and Rodriguez stated that plaintiff was “on the ca [California] court[‘]s listing”
27 because “He’s been labeled a vexatious litigator”.

169. All of the above-noted statements are false. Plaintiff has never been charged, much
less convicted of any crime his entire life. In fact, plaintiff is well-known for being an honest and fair
person. Plaintiff properly obtained a Ph.D from Yale University in 2011 before going on to write and
publish several books and articles recognized by leading scholars around the world such as Noam
Chomsky who celebrates plaintiff’s works on the backs of plaintiff’s books. Plaintiff’s writings are
available at libraries of universities and colleges world-wide and within multiple fields and specialties
of scholarship from ancient history, early historic periods, classical Greece, philosophy, poetry,
literature, politics, religion, modern history, etc. After contacting Facebook which failed to respond

1 whatsoever plaintiff filed LAPD and FBI reports and a lawsuit in 2023 to bring these evil-doers to
2 justice (see LASC case no. 23STCV14890).

3 170. After serving some of the defendants from said 2023 lawsuit (LASC case no.
4 23STCV14890) and initiating early forms of litigation an anonymous organizer, Valdes, Burger,
5 Gibbons, Blalock, Shariat and Rodriguez published a GoFundMe webpage on 7 February 2024:
6 <https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles> whereupon they
7 published Shariat's defamatory statements that plaintiff stalked and harassed Shariat at a hotel in
8 Beverly Hills. These statements are also false and defendants unjustly enriched themselves by
9 obtaining thousands of dollars from said harmful defamation. Defendants then went on national and
10 international news media outlets promoting their GoFundMe webpage and said defamatory
11 statements to billions of viewers.
12
13

14 171. At approximately the same time in early April 2024 *The Daily Mail* published a
15 litany of articles about plaintiff all misrepresenting him as a stalker and committing various other
16 crimes:
17

- 18 a) In his Daily Mail article from 13 April 2024: **"The world's most vilified man**
19 **speaks for the first time: An online female hate-mob has accused him of**
20 **stalking, extortion and MURDER. But, we reveal, there are also dark episodes**
21 **in his past..."**¹¹ Sheridan states that plaintiff was **"involved in his wife's death"** and
22 **tht he was arrested for being "involved in his wife's death"**. This is false.
23 Sheridan quotes Kartherine Anthony-Poer saying plaintiff dated her daughter and
24 stalked her. **"He stalked her, followed her and would show up at her house."**
25 This is false. Sheridan states: **"he [plaintiff] revealed that police had indeed**
26 **suspected him of murder."** This is false. Probate attorneys lied unlawfully in court
27 starting a rumor that plaintiff had been arrested for murder. Plaintiff then sued the
28 police and reasonably suspected as much. However, after six (6) depositions
plaintiff confirmed that the subject-arrest arrest for which he was never charged
regarded only the issue of forgery. The dirty police involved were sued and this case
settled in plaintiff's favor. Sheridan never asked plaintiff about any of this prior to
this publication though he had the opportunity to email him. Sheridan states: **"His**
case was dismissed by the court in May 2020, receiving no damages." This is
false. Plaintiff significantly received monetary compensation for this settlement.

¹¹ <https://www.dailymail.co.uk/news/article-13305141/stewart-lucas-murrey-sue-women-social-media.html>

1 Sheridan states while citing an anonymous source: “‘This man attempted to destroy
2 my life and my family,’ said the woman, who asked not to be identified publicly.
3 She dated him for a year and after the break-up, she sought to warn other women
4 about him in an online forum. She added: ‘He dragged me to court for two years
5 after dating and slapped me with at least 12 separate lawsuits which were settled
6 before trial.’” This is also all false, to say nothing of the fact that it is absurd to state
7 that plaintiff sued one person 12 separate times. Sherdian states: “A similar suit
8 followed against CheaterReport.com, a website that encouraged users to report a
9 cheating wife, husband, boyfriend or girlfriend. The case was dismissed two months
10 later when the Los Angeles Superior Court ruled that it lacked jurisdiction.” This is
11 false. Plaintiff’s Cheaterreport case went on for years and exposed Facebook
12 working with Cheaterreport and the national security state. This article also posted
13 plaintiff’s private texts and pictures of him where he is accompanied by an
14 individual serving papers. Plaintiff was legally and properly serving his lawsuit to
15 Gibbons and doing research on her address. But this article misrepresents the images
16 to suggest that plaintiff was stalking Gibbons. Sheridan also refers to websites like
17 AWDTSG and Cheaterreport as platforms for reasonable critiques of people. This is
18 a misrepresentation. Evidence suggests said platforms are psychological operations
19 to target innocent victims like plaintiff. Sheridan states that plaintiff’s case against
20 Poer was dismissed, thus also misrepresents the fact that plaintiff settled his case
21 against Poer and all related cases to it in his favor. It is clear Sheridan intended to
22 harm plaintiff naming him **“The world's most vilified man [who has] dark
23 episodes in his past...”**

- 24 b) In his Daily Mail article from 12 April 2024: **“The bachelor who sued 50 women
25 for calling him a bad date turned up at one of their homes even - though she
26 didn't give him her address - after she discovered online group that exposed
27 him”**¹² Bates sets up the false image that plaintiff was stalking Gibbons. Bates’
28 title further states that plaintiff is suing women “for calling him a bad date”. This
is false. Bates’ title further suggest that said Facebook AWDTSG group “exposed
him” i.e. his criminal nature or his threat to all of womankind. This is false. Bates
never contacted plaintiff nor did any due diligence regarding any of these issue.
Bates states: **“Stewart Lucas Murrey went to the Los Angeles home of Kelly
Gibbons at 10.45pm and returned again days later at 8.45pm”** again making a
harmful representation out of context. Bates’ malicious misrepresentations continue.
“Stewart Lucas Murrey went to the Los Angeles home of Kelly Gibbons at 10.45pm
and returned again days later at 8.45pm. [...] CCTV images from the property
appear to show him filming or taking photos on his mobile phone.” Bates also states:
“Stewart Lucas Murrey, the Los Angeles bachelor who unsuccessfully sued 50
women for putting his womanizing ways on blast.” This is false. Plaintiff is
successfully sued the majority of these women presently and his case against them
was never unsuccessful. This article also posted plaintiff’s private texts and pictures
of him where he is accompanied by an individual serving papers. Plaintiff was
legally and properly serving his lawsuit to Gibbons and doing research on her

¹² <https://www.dailymail.co.uk/news/article-13301999/The-bachelor-sued-50-women-calling-bad-date-turned-one-homes-didnt-address-discovered-online-group-exposed-him.html>

address. But this article misrepresents the images to suggest that plaintiff was stalking Gibbons.

- c) In his Daily Mail article from 10 April 2024: **“Men set up rival to the ‘Are we Dating the Same Guy?’ Facebook group that exposes cheating partners - as experts warn anyone posting anonymously could still be unmasked”**¹³ Parashar states: “Stewart Lucas Murrey, from Santa Monica, alleged that he was subject to a barrage of false and defamatory posts and comments on the forum. But his case was dismissed by a judge”. This is false. Plaintiff’s case continues and is stronger than ever. Parashar conflates the entirety of plaintiff’s lawsuit against well over twenty (20) defendants with one single defendant who has been dismissed: “However, on Tuesday afternoon a judge dismissed the lawsuit, ruling in favour of Vanessa Valdez”. This misrepresentation continues: “The women argued they had done nothing wrong by posting their personal opinions in a private online group on social media.” In fact, because he is intentionally obfuscating the reality that my case is not dismissed, the crack journalist for the Daily Smell even invents a new grammatical mistake to confuse and manipulate his readers to harm plaintiff further: “The judge found no evidence of conspiracy on **the women’s part** and granted an Anti-SLAPP motion - which protects those who speak out on matters of public interest against abusive lawsuits made to silence them.” (emphasis added) Because Parashar intentionally seeks to misrepresent that ALL of plaintiff’s defendants have been dismissed instead of just one of more than twenty, he miswrites: **“women’s”**. This article also posted plaintiff’s private texts and pictures of him where he is accompanied by an individual serving papers. Plaintiff was legally and properly serving his lawsuit to Gibbons and doing research on her address. But this article misrepresents the images to suggest that plaintiff was stalking Gibbons.
- d) In her Daily Mail article from 9 April 2024: **“Judge dismisses a \$2.6 million claim by a bachelor, 32, against dozens of women who mocked him for being a ‘bad date’ in a viral Facebook group: ‘They did nothing wrong’”**¹⁴ Pedler also misrepresents that plaintiff’s lawsuit has been dismissed in her title and when she states: “The judge also reportedly found that based on the evidence presented, the court did not see any possibility of Murray winning against the defendants on any claim he made.” This is false. The judge made no such statement.
- e) In her Daily Mail article from 21 March 2024: **“LA bachelor launches LAWSUIT against more than 50 female members of controversial Facebook group that ‘exposes’ unfaithful men over claims they wrongfully branded him a MURDERER who had STIs in scathing online posts”**¹⁵ Saunt states in title and her article that AWDTSG innocently exposes cheating and harmful men: She states: “The lawsuit stems from the social media group, which currently has more than 52,500 members, **where daters issue warnings about potentially harmful or deceitful men**” (emphasis added). This is false. AWDTSG is not an innocent group that only “issue[s] warnings about potentially harmful or deceitful men”.

¹³ <https://www.dailymail.co.uk/news/article-13291977/Fight-against-women-naming-shaming-bad-exes.html>

¹⁴ <https://www.dailymail.co.uk/news/article-13287847/Judge-dismisses-defamation-lawsuit-brought-LA-bachelor-against-50-women-discovered-discussing-Facebook-group-called-dating-guy.html>

¹⁵ <https://www.dailymail.co.uk/femail/article-13224259/are-dating-guy-la-sues-women-murderer.html>

1 172. Along with failing to properly do its and their due diligence, *The Daily Mail*
2 quoted anonymous sources and one Katherine Poer-Anthony who stated on or before 13 April 2024
3 to the Daily Mail that plaintiff had stalked her daughter. Anthony-Poer stated: “**He stalked her,**
4 **followed her and would show up at her house.**” This is all false.

5
6 173. On or about 12 April 2024 Valdes filed a police report against plaintiff wherein
7 Valdes claimed that plaintiff had “doxed” her i.e. electronically harassed her by posting harmful
8 information online (California Penal Code § 653.2). This is false. Valdes further harassed plaintiff by
9 filing a restraining order petition against plaintiff whose trial-hearing denied Valdes’ petition on 11
10 July 2024.

11
12 174. As a result of the above-noted intentional and malicious defamation, in particular in
13 regard to the false stories about stalking, plaintiff has been the subject of and received death threats.
14 Anonymous Facebook users also initiated and operated accounts impersonating and harassing
15 plaintiff. Other anonymous users such as “Holden_Guardian_Co” on Reddit.com claimed that
16 plaintiff suffers from psychological disorders such as autism. This is false.

17 175. All of the above-noted statements about plaintiff are false.

18 176. The above-noted statements about plaintiff were published to third-parties.

19 177. Said third-parties reasonably understood the statements referred to plaintiff.

20 178. The above-noted defendants made said statements out of malice, knowing the falsity
21 of them and without doing any due diligence prior to their publication.

22 179. The above-noted statements about plaintiff were not privileged.

23 180. As a result of the above-noted statements plaintiff’s reputation was damaged and
24 adversely affected and he has been exposed to hatred, contempt, ridicule and obloquy; said
25 statements caused him to be shunned and avoided; and they have a tendency to injure him in his
26
27
28

1 occupation; thus plaintiff has lost a significant amount of money, including, but not limited to, his
2 scholarly, legal and entrepreneurial pursuits.

3 181. Unless and until enjoined and restrained by order of this court, defendants' wrongful
4 conduct will continue to cause irreparable harm to plaintiff, entitling him to seek declaratory relief.

5 182. This action, if successful, will enforce an important right affecting public interest and
6 would confer a significant benefit, whether pecuniary or non-pecuniary, for the general public.
7 Because this case is brought for the purposes of enforcing important rights affecting public interest,
8 plaintiff also seeks recovery of attorney's fees and costs in prosecuting this action against defendants
9 under code of civil procedure § 1021.5 and other applicable law.
10

11
12 **X.**
13 **SIXTH CAUSE OF ACTION**
14 **DEFAMATION-LIBEL *PER SE***

15 *Against Defendants The Daily Mail, Sheridan, Bates, Pedler, Parashar, Saunt, Katherine Poer-*
16 *Anthony, Anonymous organizer, Gibbons, Shariat, Vanderford, Blalock, Burger, Valdes, Wiz,*
17 *Rodriguez, Anonymous Facebook account and "Holden_Guardian_Co"*

18 183. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
19 they were fully set forth herein.

20 184. As noted above, during 2023 and since plaintiff began to obtain evidence of a
21 cyber-attack on his person including defamatory claims that include, but are not limited to the
22 following statements:

- 23 a) an anonymous Facebook account stated that "[p]ublic records show [that] he
24 [plaintiff] has several domestic violence charges filed against him plus
25 involvement in [a] MURDER case of his ex wife" that plaintiff "is
26 DANGEROUS"; and that plaintiff "[f]iled 11 court cases against women in 33
27 months trying to extort money from them";
28 b) Gibbons stated that plaintiff "pressed lawsuits against a number of women to
extort money from them and was suspected in the murder of his ex[-]wife"; that
plaintiff engages in "extortion lawsuits"; is under "murder suspicion" –
presumably for murdering his girlfriend who passed from cancer in 2018 –; that
plaintiff is guilty of "fraudulent behavior", "using a false identity", "posing a
significant risk of attempting to obtain money from other users through deceitful

- means”, is “suing a company that catches cheaters and the suspicion of murdering his wife?! Dateline vibes”, that plaintiff is “obviously a predator”, whose Ph.D from Yale University is fraudulent;
- c) an anonymous group member stated plaintiff “killed” his “ex”; that plaintiff has committed “crimes!”; that plaintiff “said he was an [a]ttorney”; and that the online dating app “[H]inge” banned him “for fraudulent behavior”;
 - d) Blalock stated that “I’m afraid if there’s any missing women in LA – he [plaintiff] has something to do with it” and that “[h]e [plaintiff] [i]s going to end up on Dateline one day.”
 - e) Shariat stated that plaintiff aggressively stalked her via her Instagram posts and finally tracked her down at a hotel in Beverly Hills whereat plaintiff grabbed her wrist violently and acted so harassingly that even years later Shariat is unable to sleep and still wakes up in terror;
 - f) Vanderford stated that plaintiff is an “abusive murderer”; that he has acted “Fraudulent”; that “He is truly dangerous”; and Vanderford posted statements that “[p]ublic records show [that] he [plaintiff] has several domestic violence charges filed against him plus involvement in [a] MURDER case of his ex wife” that plaintiff “is DANGEROUS”; and that plaintiff “[f]iled 11 court cases against women in 33 months trying to extort money from them”;
 - g) Wiz stated that plaintiff was “a murder suspect” and that “exes has accused him of ‘stds’”;
 - h) and Rodriguez stated that plaintiff was “on the ca [California] court[‘]s listing” because “He’s been labeled a vexatious litigator”.

185. All of the above-noted statements are false. Plaintiff has never been charged, much less convicted of any crime his entire life. In fact, plaintiff is well-known for being an honest and fair person. Plaintiff properly obtained a Ph.D from Yale University in 2011 before going on to write and publish several books and articles recognized by leading scholars around the world such as Noam Chomsky who celebrates plaintiff’s works on the backs of plaintiff’s books. Plaintiff’s writings are available at libraries of universities and colleges world-wide and within multiple fields and specialties of scholarship from ancient history, early historic periods, classical Greece, philosophy, poetry, literature, politics, religion, modern history, etc. After contacting Facebook which failed to respond whatsoever plaintiff filed LAPD and FBI reports and a lawsuit in 2023 to bring these evil-doers to justice (see LASC case no. 23STCV14890).

186. After serving some of the defendants from said 2023 lawsuit (LASC case no.

23STCV14890) and initiating early forms of litigation an anonymous organizer, Valdes, Burger, Gibbons, Blalock, Shariat and Rodriguez published a GoFundMe webpage on 7 February 2024: <https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles> whereupon they published Shariat's defamatory statements that plaintiff stalked and harassed Shariat at a hotel in Beverly Hills. These statements are also false and defendants unjustly enriched themselves by obtaining thousands of dollars from said harmful defamation. Defendants then went on national and international news media outlets promoting their GoFundMe webpage and said defamatory statements to billions of viewers.

187. At approximately the same time in early April 2024 *The Daily Mail* published a litany of articles about plaintiff all misrepresenting him as a stalker and committing various other crimes:

- a) In his Daily Mail article from 13 April 2024: **"The world's most vilified man speaks for the first time: An online female hate-mob has accused him of stalking, extortion and MURDER. But, we reveal, there are also dark episodes in his past..."**¹⁶ Sheridan states that plaintiff was **"involved in his wife's death"** and that he was **arrested for being "involved in his wife's death"**. This is false. Sheridan quotes Kartherine Anthony-Poer saying plaintiff dated her daughter and stalked her. **"He stalked her, followed her and would show up at her house."** This is false. Sheridan states: **"he [plaintiff] revealed that police had indeed suspected him of murder."** This is false. Probate attorneys lied unlawfully in court starting a rumor that plaintiff had been arrested for murder. Plaintiff then sued the police and reasonably suspected as much. However, after six (6) depositions plaintiff confirmed that the subject-arrest arrest for which he was never charged regarded only the issue of forgery. The dirty police involved were sued and this case settled in plaintiff's favor. Sheridan never asked plaintiff about any of this prior to this publication though he had the opportunity to email him. Sheridan states: **"His case was dismissed by the court in May 2020, receiving no damages."** This is false. Plaintiff significantly received monetary compensation for this settlement. Sheridan states while citing an anonymous source: **"'This man attempted to destroy my life and my family,' said the woman, who asked not to be identified publicly. She dated him for a year and after the break-up, she sought to warn other women about him in an online forum. She added: 'He dragged me to court for two years after dating and slapped me with at least 12 separate lawsuits which were settled before trial.'"** This is also all false, to say nothing of the fact that it is absurd to state

¹⁶ <https://www.dailymail.co.uk/news/article-13305141/stewart-lucas-murrey-sue-women-social-media.html>

that plaintiff sued one person 12 separate times. Sherdian states: “A similar suit followed against CheaterReport.com, a website that encouraged users to report a cheating wife, husband, boyfriend or girlfriend. The case was dismissed two months later when the Los Angeles Superior Court ruled that it lacked jurisdiction.” This is false. Plaintiff’s Cheaterreport case went on for years and exposed Facebook working with Cheaterreport and the national security state. This article also posted plaintiff’s private texts and pictures of him where he is accompanied by an individual serving papers. Plaintiff was legally and properly serving his lawsuit to Gibbons and doing research on her address. But this article misrepresents the images to suggest that plaintiff was stalking Gibbons. Sheridan also refers to websites like AWDTSG and Cheaterreport as platforms for reasonable critiques of people. This is a misrepresentation. Evidence suggests said platforms are psychological operations to target innocent victims like plaintiff. Sheridan states that plaintiff’s case against Poer was dismissed, thus also misrepresents the fact that plaintiff settled his case against Poer and all related cases to it in his favor. It is clear Sheridan intended to harm plaintiff naming him **“The world's most vilified man [who has] dark episodes in his past...”**

- b) In his Daily Mail article from 12 April 2024: **“The bachelor who sued 50 women for calling him a bad date turned up at one of their homes even - though she didn't give him her address - after she discovered online group that exposed him”**¹⁷ Bates sets up the false image that plaintiff was stalking Gibbons. Bates’ title further states that plaintiff is suing women “for calling him a bad date”. This is false. Bates’ title further suggest that said Facebook AWDTSG group “exposed him” i.e. his criminal nature or his threat to all of womankind. This is false. Bates never contacted plaintiff nor did any due diligence regarding any of these issue. Bates states: **“Stewart Lucas Murrey went to the Los Angeles home of Kelly Gibbons at 10.45pm and returned again days later at 8.45pm”** again making a harmful representation out of context. Bates’ malicious misrepresentations continue. “Stewart Lucas Murrey went to the Los Angeles home of Kelly Gibbons at 10.45pm and returned again days later at 8.45pm. [...] CCTV images from the property appear to show him filming or taking photos on his mobile phone.” Bates also states: “Stewart Lucas Murrey, the Los Angeles bachelor who unsuccessfully sued 50 women for putting his womanizing ways on blast.” This is false. Plaintiff is successfully sued the majority of these women presently and his case against them was never unsuccessful. This article also posted plaintiff’s private texts and pictures of him where he is accompanied by an individual serving papers. Plaintiff was legally and properly serving his lawsuit to Gibbons and doing research on her address. But this article misrepresents the images to suggest that plaintiff was stalking Gibbons.
- c) In his Daily Mail article from 10 April 2024: **“Men set up rival to the ‘Are we Dating the Same Guy?’ Facebook group that exposes cheating partners - as experts warn anyone posting anonymously could still be unmasked”**¹⁸ Parashar states: “Stewart Lucas Murrey, from Santa Monica, alleged that he was subject to a

¹⁷ <https://www.dailymail.co.uk/news/article-13301999/The-bachelor-sued-50-women-calling-bad-date-turned-one-homes-didnt-address-discovered-online-group-exposed-him.html>

¹⁸ <https://www.dailymail.co.uk/news/article-13291977/Fight-against-women-naming-shaming-bad-exes.html>

1 barrage of false and defamatory posts and comments on the forum. But his case was
2 dismissed by a judge”. This is false. Plaintiff’s case continues and is stronger than
3 ever. Parashar conflates the entirety of plaintiff’s lawsuit against well over twenty
4 (20) defendants with one single defendant who has been dismissed: “However, on
5 Tuesday afternoon a judge dismissed the lawsuit, ruling in favour of Vanessa
6 Valdez”. This misrepresentations continues: “The women argued they had done
7 nothing wrong by posting their personal opinions in a private online group on social
8 media.” In fact, because he is intentionally obfuscating the reality that my case is not
9 dismissed, the crack journalist for the Daily Smell even invents a new grammatical
10 mistake to confuse and manipulate his readers to harm plaintiff further: “The judge
11 found no evidence of conspiracy on **the women's part** and granted an Anti-SLAPP
12 motion - which protects those who speak out on matters of public interest against
13 abusive lawsuits made to silence them.” (emphasis added) Because Parashar
14 intentionally seeks to misrepresent that ALL of plaintiff’s defendants have been
15 dismissed instead of just one of more than twenty, he miswrites: “**women’s**”. This
16 article also posted plaintiff’s private texts and pictures of him where he is
17 accompanied by an individual serving papers. Plaintiff was legally and properly
18 serving his lawsuit to Gibbons and doing research on her address. But this article
19 misrepresents the images to suggest that plaintiff was stalking Gibbons.

20 d) In her Daily Mail article from 9 April 2024: “**Judge dismisses a \$2.6 million claim
21 by a bachelor, 32, against dozens of women who mocked him for being a ‘bad
22 date’ in a viral Facebook group: ‘They did nothing wrong’**”¹⁹ Pedler also
23 misrepresents that plaintiff’s lawsuit has been dismissed in her title and when she
24 states: “The judge also reportedly found that based on the evidence presented, the
25 court did not see any possibility of Murray winning against the defendants on any
26 claim he made.” This is false. The judge made no such statement.

27 e) In her Daily Mail article from 21 March 2024: “**LA bachelor launches
28 LAWSUIT against more than 50 female members of controversial Facebook
group that ‘exposes’ unfaithful men over claims they wrongfully branded him a
MURDERER who had STIs in scathing online posts**”²⁰ Saunt states in title and
her article that AWDTSG innocently exposes cheating and harmful men: She
states: “The lawsuit stems from the social media group, which currently has more
than 52,500 members, **where daters issue warnings about potentially harmful or
deceitful men**” (emphasis added). This is false. AWDTSG is not an innocent group
that only “issue[s] warnings about potentially harmful or deceitful men”.

188. Along with failing to properly do its and their due diligence, *The Daily Mail* quoted
anonymous sources and one Katherine Poer-Anthony who stated on or before 13 April 2024 to the
Daily Mail that plaintiff had stalked her daughter. Anthony-Poer stated: “**He stalked her, followed
her and would show up at her house.**” This is all false.

¹⁹ <https://www.dailymail.co.uk/news/article-13287847/Judge-dismisses-defamation-lawsuit-brought-LA-bachelor-against-50-women-discovered-discussing-Facebook-group-called-dating-guy.html>

1 189. On or about 12 April 2024 Valdes filed a police report against plaintiff wherein
2 Valdes claimed that plaintiff had “doxed” her i.e. electronically harassed her by posting harmful
3 information online (California Penal Code § 653.2). This is false. Valdes further harassed plaintiff by
4 filing a restraining order petition against plaintiff whose trial-hearing denied Valdes’ petition on 11
5 July 2024.
6

7 190. As a result of the above-noted intentional and malicious defamation, in particular in
8 regard to the false stories about stalking, plaintiff has been the subject of and received death threats.
9 Anonymous Facebook users also initiated and operated accounts impersonating and harassing
10 plaintiff. Other anonymous users such as “Holden_Guardian_Co” on Reddit.com claimed that
11 plaintiff suffers from psychological disorders such as autism. This is false.
12

13 191. All of the above-noted statements about plaintiff are false.

14 192. Said statements count as defamation *per se* because they accuse plaintiff of
15 committing crimes and immoral conduct and turpitude (stalking, having a dark side wherein serious
16 crimes are hidden, being a threat to all women, etc.); having a contagion, infection or “loathsome”
17 disease (STDs); having engaged in sexual misconduct or being unchaste (cheating thus the
18 misrepresentations of “Are We Dating The Same Guy?” as simply an innocent group exposing
19 cheaters and not its true nature as a front to harm innocent people like plaintiff); and harmed
20 plaintiff’s business, trade or profession.
21

22 193. The above-noted statements about plaintiff were published to third-parties.

23 194. Said third-parties reasonably understood the statements referred to plaintiff.

24 195. The above-noted defendants made said statements out of malice, knowing the falsity
25 of them and without doing any due diligence prior to their publication.
26

27 196. The above-noted statements about plaintiff were not privileged.
28

²⁰ <https://www.dailymail.co.uk/femail/article-13224259/are-dating-guy-la-sues-women-murderer.html>

197. As a result of the above-noted statements plaintiff's reputation was damaged and adversely affected and he has been exposed to hatred, contempt, ridicule and obloquy; said statements caused him to be shunned and avoided; and they have a tendency to injure him in his occupation; thus plaintiff has lost a significant amount of money, including, but not limited to, his scholarly, legal and entrepreneurial pursuits.

198. Unless and until enjoined and restrained by order of this court, defendants' wrongful conduct will continue to cause irreparable harm to plaintiff, entitling him to seek declaratory relief.

199. This action, if successful, will enforce an important right affecting public interest and would confer a significant benefit, whether pecuniary or non-pecuniary, for the general public. Because this case is brought for the purposes of enforcing important rights affecting public interest, plaintiff also seeks recovery of attorney's fees and costs in prosecuting this action against defendants under code of civil procedure § 1021.5 and other applicable law.

XI.
SEVENTH CAUSE OF ACTION
DEFAMATION PER QUOD

Against Defendants The Daily Mail, Sheridan, Bates, Pedler, Parashar, Saunt, Katherine Poer-Anthony, Anonymous organizer, Gibbons, Shariat, Vanderford, Blalock, Burger, Valdes, Wiz, Rodriguez, Anonymous Facebook account and “Holden Guardian Co”

200. Plaintiff incorporates all allegations of this complaint and re-alleges them as though they were fully set forth herein.

201. As noted above, during 2023 and since plaintiff began to obtain evidence of a cyber-attack on his person including defamatory claims that include, but are not limited to the following statements:

a) an anonymous Facebook account stated that “[p]ublic records show [that] he [plaintiff] has several domestic violence charges filed against him plus involvement in [a] MURDER case of his ex wife” that plaintiff “is DANGEROUS”; and that plaintiff “[f]iled 11 court cases against women in 33 months trying to extort money from them”;

- 1 b) Gibbons stated that plaintiff “pressed lawsuits against a number of women to
2 extort money from them and was suspected in the murder of his ex[-]wife”; that
3 plaintiff engages in “extortion lawsuits”; is under “murder suspicion” –
4 presumably for murdering his girlfriend who passed from cancer in 2018 –; that
5 plaintiff is guilty of “fraudulent behavior”, “using a false identity”, “posing a
6 significant risk of attempting to obtain money from other users through deceitful
7 means”, is “suing a company that catches cheaters and the suspicion of murdering
8 his wife?! Dateline vibes”, that plaintiff is “obviously a predator”, whose Ph.D
9 from Yale University is fraudulent;
- 10 c) an anonymous group member stated plaintiff “killed” his “ex”; that plaintiff has
11 committed “crimes!”; that plaintiff “said he was an [a]ttorney”; and that the online
12 dating app “[H]inge” banned him “for fraudulent behavior”;
- 13 d) Blalock stated that “I’m afraid if there’s any missing women in LA – he [plaintiff]
14 has something to do with it” and that “[h]e [plaintiff] [i]s going to end up on
15 Dateline one day.”
- 16 e) Shariat stated that plaintiff aggressively stalked her via her Instagram posts and
17 finally tracked her down at a hotel in Beverly Hills whereat plaintiff grabbed her
18 wrist violently and acted so harassingly that even years later Shariat is unable to
19 sleep and still wakes up in terror;
- 20 f) Vanderford stated that plaintiff is an “abusive murderer”; that he has acted
21 “Fraudulent”; that “He is truly dangerous”; and Vanderford posted statements that
22 “[p]ublic records show [that] he [plaintiff] has several domestic violence charges
23 filed against him plus involvement in [a] MURDER case of his ex wife” that
24 plaintiff “is DANGEROUS”; and that plaintiff “[f]iled 11 court cases against
25 women in 33 months trying to extort money from them”;
- 26 g) Wiz stated that plaintiff was “a murder suspect” and that “exes has accused him of
27 ‘stds’”;
- 28 h) and Rodriguez stated that plaintiff was “on the ca [California] court[‘]s listing”
because “He’s been labeled a vexatious litigator”.

202. All of the above-noted statements are false. Plaintiff has never been charged, much
less convicted of any crime his entire life. In fact, plaintiff is well-known for being an honest and fair
person. Plaintiff properly obtained a Ph.D from Yale University in 2011 before going on to write and
publish several books and articles recognized by leading scholars around the world such as Noam
Chomsky who celebrates plaintiff’s works on the backs of plaintiff’s books. Plaintiff’s writings are
available at libraries of universities and colleges world-wide and within multiple fields and specialties
of scholarship from ancient history, early historic periods, classical Greece, philosophy, poetry,
literature, politics, religion, modern history, etc. After contacting Facebook which failed to respond

1 whatsoever plaintiff filed LAPD and FBI reports and a lawsuit in 2023 to bring these evil-doers to
2 justice (see LASC case no. 23STCV14890).

3 203. After serving some of the defendants from said 2023 lawsuit (LASC case no.
4 23STCV14890) and initiating early forms of litigation an anonymous organizer, Valdes, Burger,
5 Gibbons, Blalock, Shariat and Rodriguez published a GoFundMe webpage on 7 February 2024:
6 <https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles> whereupon they
7 published Shariat's defamatory statements that plaintiff stalked and harassed Shariat at a hotel in
8 Beverly Hills. These statements are also false and defendants unjustly enriched themselves by
9 obtaining thousands of dollars from said harmful defamation. Defendants then went on national and
10 international news media outlets promoting their GoFundMe webpage and said defamatory
11 statements to billions of viewers.
12

13
14 204. At approximately the same time in early April 2024 *The Daily Mail* published a
15 litany of articles about plaintiff all misrepresenting him as a stalker and committing various other
16 crimes:
17

- 18 a) In his Daily Mail article from 13 April 2024: **"The world's most vilified man**
19 **speaks for the first time: An online female hate-mob has accused him of**
20 **stalking, extortion and MURDER. But, we reveal, there are also dark episodes**
21 **in his past..."**²¹ Sheridan states that plaintiff was **"involved in his wife's death"** and
22 **tht he was arrested for being "involved in his wife's death"**. This is false.
23 Sheridan quotes Kartherine Anthony-Poer saying plaintiff dated her daughter and
24 stalked her. **"He stalked her, followed her and would show up at her house."**
25 This is false. Sheridan states: **"he [plaintiff] revealed that police had indeed**
26 **suspected him of murder."** This is false. Probate attorneys lied unlawfully in court
27 starting a rumor that plaintiff had been arrested for murder. Plaintiff then sued the
28 police and reasonably suspected as much. However, after six (6) depositions
plaintiff confirmed that the subject-arrest arrest for which he was never charged
regarded only the issue of forgery. The dirty police involved were sued and this case
settled in plaintiff's favor. Sheridan never asked plaintiff about any of this prior to
this publication though he had the opportunity to email him. Sheridan states: **"His**
case was dismissed by the court in May 2020, receiving no damages." This is
false. Plaintiff significantly received monetary compensation for this settlement.

²¹ <https://www.dailymail.co.uk/news/article-13305141/stewart-lucas-murrey-sue-women-social-media.html>

1 Sheridan states while citing an anonymous source: “‘This man attempted to destroy
2 my life and my family,’ said the woman, who asked not to be identified publicly.
3 She dated him for a year and after the break-up, she sought to warn other women
4 about him in an online forum. She added: ‘He dragged me to court for two years
5 after dating and slapped me with at least 12 separate lawsuits which were settled
6 before trial.’” This is also all false, to say nothing of the fact that it is absurd to state
7 that plaintiff sued one person 12 separate times. Sherdian states: “A similar suit
8 followed against CheaterReport.com, a website that encouraged users to report a
9 cheating wife, husband, boyfriend or girlfriend. The case was dismissed two months
10 later when the Los Angeles Superior Court ruled that it lacked jurisdiction.” This is
11 false. Plaintiff’s Cheaterreport case went on for years and exposed Facebook
12 working with Cheaterreport and the national security state. This article also posted
13 plaintiff’s private texts and pictures of him where he is accompanied by an
14 individual serving papers. Plaintiff was legally and properly serving his lawsuit to
15 Gibbons and doing research on her address. But this article misrepresents the images
16 to suggest that plaintiff was stalking Gibbons. Sheridan also refers to websites like
17 AWDTSG and Cheaterreport as platforms for reasonable critiques of people. This is
18 a misrepresentation. Evidence suggests said platforms are psychological operations
19 to target innocent victims like plaintiff. Sheridan states that plaintiff’s case against
20 Poer was dismissed, thus also misrepresents the fact that plaintiff settled his case
21 against Poer and all related cases to it in his favor. It is clear Sheridan intended to
22 harm plaintiff naming him **“The world's most vilified man [who has] dark
23 episodes in his past...”**

- 24 b) In his Daily Mail article from 12 April 2024: **“The bachelor who sued 50 women
25 for calling him a bad date turned up at one of their homes even - though she
26 didn't give him her address - after she discovered online group that exposed
27 him”**²² Bates sets up the false image that plaintiff was stalking Gibbons. Bates’
28 title further states that plaintiff is suing women “for calling him a bad date”. This
is false. Bates’ title further suggest that said Facebook AWDTSG group “exposed
him” i.e. his criminal nature or his threat to all of womankind. This is false. Bates
never contacted plaintiff nor did any due diligence regarding any of these issue.
Bates states: **“Stewart Lucas Murrey went to the Los Angeles home of Kelly
Gibbons at 10.45pm and returned again days later at 8.45pm”** again making a
harmful representation out of context. Bates’ malicious misrepresentations continue.
“Stewart Lucas Murrey went to the Los Angeles home of Kelly Gibbons at 10.45pm
and returned again days later at 8.45pm. [...] CCTV images from the property
appear to show him filming or taking photos on his mobile phone.” Bates also states:
“Stewart Lucas Murrey, the Los Angeles bachelor who unsuccessfully sued 50
women for putting his womanizing ways on blast.” This is false. Plaintiff is
successfully sued the majority of these women presently and his case against them
was never unsuccessful. This article also posted plaintiff’s private texts and pictures
of him where he is accompanied by an individual serving papers. Plaintiff was
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address. But this article misrepresents the images to suggest that plaintiff was stalking Gibbons.

- c) In his Daily Mail article from 10 April 2024: **“Men set up rival to the ‘Are we Dating the Same Guy?’ Facebook group that exposes cheating partners - as experts warn anyone posting anonymously could still be unmasked”**²³ Parashar states: “Stewart Lucas Murrey, from Santa Monica, alleged that he was subject to a barrage of false and defamatory posts and comments on the forum. But his case was dismissed by a judge”. This is false. Plaintiff’s case continues and is stronger than ever. Parashar conflates the entirety of plaintiff’s lawsuit against well over twenty (20) defendants with one single defendant who has been dismissed: “However, on Tuesday afternoon a judge dismissed the lawsuit, ruling in favour of Vanessa Valdez”. This misrepresentation continues: “The women argued they had done nothing wrong by posting their personal opinions in a private online group on social media.” In fact, because he is intentionally obfuscating the reality that my case is not dismissed, the crack journalist for the Daily Smell even invents a new grammatical mistake to confuse and manipulate his readers to harm plaintiff further: “The judge found no evidence of conspiracy on **the women’s part** and granted an Anti-SLAPP motion - which protects those who speak out on matters of public interest against abusive lawsuits made to silence them.” (emphasis added) Because Parashar intentionally seeks to misrepresent that ALL of plaintiff’s defendants have been dismissed instead of just one of more than twenty, he miswrites: **“women’s”**. This article also posted plaintiff’s private texts and pictures of him where he is accompanied by an individual serving papers. Plaintiff was legally and properly serving his lawsuit to Gibbons and doing research on her address. But this article misrepresents the images to suggest that plaintiff was stalking Gibbons.
- d) In her Daily Mail article from 9 April 2024: **“Judge dismisses a \$2.6 million claim by a bachelor, 32, against dozens of women who mocked him for being a ‘bad date’ in a viral Facebook group: ‘They did nothing wrong’”**²⁴ Pedler also misrepresents that plaintiff’s lawsuit has been dismissed in her title and when she states: “The judge also reportedly found that based on the evidence presented, the court did not see any possibility of Murray winning against the defendants on any claim he made.” This is false. The judge made no such statement.
- e) In her Daily Mail article from 21 March 2024: **“LA bachelor launches LAWSUIT against more than 50 female members of controversial Facebook group that ‘exposes’ unfaithful men over claims they wrongfully branded him a MURDERER who had STIs in scathing online posts”**²⁵ Saunt states in title and her article that AWDTSG innocently exposes cheating and harmful men: She states: “The lawsuit stems from the social media group, which currently has more than 52,500 members, **where daters issue warnings about potentially harmful or deceitful men**” (emphasis added). This is false. AWDTSG is not an innocent group that only “issue[s] warnings about potentially harmful or deceitful men”.

²³ <https://www.dailymail.co.uk/news/article-13291977/Fight-against-women-naming-shaming-bad-exes.html>

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²⁵ <https://www.dailymail.co.uk/femail/article-13224259/are-dating-guy-la-sues-women-murderer.html>

1 205. Along with failing to properly do its and their due diligence, *The Daily Mail* quoted
2 anonymous sources and one Katherine Poer-Anthony who stated on or before 13 April 2024 to the
3 Daily Mail that plaintiff had stalked her daughter. Anthony-Poer stated: **“He stalked her, followed**
4 **her and would show up at her house.”** This is all false.

5
6 206. On or about 12 April 2024 Valdes filed a police report against plaintiff wherein
7 Valdes claimed that plaintiff had “doxed” her i.e. electronically harassed her by posting harmful
8 information online (California Penal Code § 653.2). This is false. Valdes further harassed plaintiff by
9 filing a restraining order petition against plaintiff whose trial-hearing denied Valdes’ petition on 11
10 July 2024.

11
12 207. As a result of the above-noted intentional and malicious defamation, in particular in
13 regard to the false stories about stalking, plaintiff has been the subject of and received death threats.
14 Anonymous Facebook users also initiated and operated accounts impersonating and harassing
15 plaintiff. Other anonymous users such as “Holden_Guardian_Co” on Reddit.com claimed that
16 plaintiff suffers from psychological disorders such as autism. This is false.

17
18 208. Said defendants published or caused to be published statements about plaintiff that are
19 defamatory when considered in light of extrinsic facts known to the audience or that could be
20 reasonably inferred.

21 209. These statements, when understood in their proper context, implied false and
22 defamatory meanings about plaintiff, including accusations of criminal conduct, immoral behavior or
23 dishonesty.

24
25 210. The defamatory nature of these statements are exceeding apparent when considering
26 additional facts, such as plaintiff’s identity and background or prior relationships with other
27 individuals named in the defamatory content.

211. The statements have caused special damages to plaintiff, including but not limited to emotional distress, emotional loss, loss of professional opportunities, and damage to his reputation and relationships.

212. The statements were published negligently, recklessly, or with actual malice, in that defendants either knew the defamatory implications of the statements or failed to take reasonable care to ascertain their truth before publication.

213. Facebook, AWDTSO and Daily Mail recommendation algorithms materially contributed to the harm by amplifying the reach of the defamatory content, making it accessible to a larger audience and exacerbating the damage to plaintiff's reputation.

214. As a direct and proximate result of the publication of these statements, plaintiff has suffered significant harm, including loss of income, business opportunities, and other pecuniary damages.

215. Plaintiff seeks relief in the form of compensatory damages, punitive damages, and an injunction against further defamatory publications.

216. Unless and until enjoined and restrained by order of this Court, defendants' wrongful conduct will continue to cause irreparable harm to plaintiff, entitling him to seek declaratory relief.

217. This action, if successful, will enforce an important right affecting the public interest would confer a significant benefit, whether pecuniary or non-pecuniary, for the general public. Because this case is brought for the purposes of enforcing important rights affect the public interest, plaintiff also seeks recovery of attorney's fees and costs in prosecuting this action against defendants under code of civil procedure § 1021.5 and other applicable law.

XII. EIGHTH CAUSE OF ACTION FALSE LIGHT

1 *Against Defendants The Daily Mail, Sheridan, Bates, Pedler, Parashar, Saunt, Katherine Poer-*
2 *Anthony, Anonymous organizer, Gibbons, Shariat, Vanderford, Blalock, Burger, Valdes, Wiz,*
3 *Rodriguez, Anonymous Facebook account and "Holden_Guardian_Co"*

4 218. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
5 they were fully set forth herein.

6 219. Defendants publicly disclosed information or material without plaintiff's consent or
7 giving him notice, that include, but is not limited to images of him, his private text messages,
8 personal information and history related to his previous actions that all showed plaintiff in a false
9 light.

10 220. Defendants made said disclosure to make it seem like plaintiff had stalked several
11 women and continued to be stalking women in the present, that he was a threat to all women; that he
12 was unchaste, deceitful, etc.

13 221. Defendants made said disclosures to billions of viewers and users online via Facebook
14 forums and via local, national and international news media outlets and other such agencies and outlets.

15 222. All of the above-noted images that defendants knowingly created by said disclosures
16 are false and/or never occurred and would be highly offensive to a reasonable person in plaintiff's
17 position.
18

19 223. There is clear and convincing evidence that defendants knew that their disclosure
20 would create a false impression about plaintiff and they acted with reckless disregard for the truth.
21

22 224. Defendants were negligent in determining the truth of the information and whether a
23 false impression would be created by this disclosure.

24 225. Defendants' conduct was a substantial factor in causing plaintiff's harm.

25 226. Unless and until enjoined and restrained by order of this Court, defendants' wrongful
26 conduct will continue to cause irreparable harm to plaintiff, entitling him to seek declaratory relief.
27
28

227. This action, if successful, will enforce an important right affecting the public interest would confer a significant benefit, whether pecuniary or non-pecuniary, for the general public. Because this case is brought for the purposes of enforcing important rights affect the public interest, plaintiff also seeks recovery of attorney's fees and costs in prosecuting this action against defendants under code of civil procedure § 1021.5 and other applicable law.

XIII.
NINTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Against Defendants AWDTS, The Daily Mail, Sheridan, Bates, Pedler, Parashar, Saunt, Katherine Poer-Anthony, Anonymous organizer, Gibbons, Shariat, Vanderford, Blalock, Burger, Valdes, Wiz, Rodriguez, Anonymous Facebook account and "Holden Guardian Co"

228. Plaintiff incorporates all allegations of this complaint and re-alleges them as though they were fully set forth herein.

229. Defendants' conduct of defaming and cyberbullying plaintiff online and off-line was and is outrageous.

230. Defendants intended to cause plaintiff emotional distress.

231. Defendants acted with reckless disregard for the probability that plaintiff would suffer emotional distress, knowing that plaintiff was the subject when their conduct occurred.

232. Plaintiff suffered emotional distress; and

233. Defendants' conduct was a substantial factor in causing plaintiff severe emotional distress.

234. As the actual and proximate result of the intentional acts of defendants, plaintiff suffered serious, lasting emotional distress, including but not limited to: emotional distress, mental and physical harm, post-traumatic stress syndrome, mortification and grief.

235. Plaintiff has had to hire and retain physicians and health care professionals to treat him

1 for the psychological and physical harm he has suffered and continues to suffer. Plaintiff has suffered
2 medical special damages and incurred medical bills and has suffered general damages of fright, pain,
3 grief, mortification and harm, all in amounts to be proven at the time of the trial herein.

4 236. Unless and until enjoined and restrained by order of this Court, defendants' wrongful
5 conduct will continue to cause irreparable harm to plaintiff, entitling him to seek declaratory relief.
6

7 237. This action, if successful, will enforce an important right affecting the public interest
8 would confer a significant benefit, whether pecuniary or non-pecuniary, for the general public.
9 Because this case is brought for the purposes of enforcing important rights affect the public interest,
10 plaintiff also seeks recovery of attorney's fees and costs in prosecuting this action against defendants
11 under code of civil procedure § 1021.5 and other applicable law.
12

13 **XIV.**
14 **TENTH CAUSE OF ACTION**
15 **MISAPPROPRIATION OF NAME AND LIKENESS**
16 *Against defendant anonymous Facebook account*

17 238. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
18 they were fully set forth herein.

19 239. Sometime in 2024 an anonymous Facebook account used plaintiff name and likeness
20 to create a Facebook account: "Stewart Lucas Murrey Clown" with images of plaintiff.²⁶ Sometime
21 prior to and or around 2024 anonymous defendants developed email addresses and other social media
22 accounts with plaintiff's name and/or clear references to plaintiff's identity, including, but not limited
23 to lucasmurrey123@gmail.com and drluc369@gmail.com.

24 240. Plaintiff did not consent to this use.

25 241. There is a direct symbolic link between the above-noted misappropriation of name and
26
27

28 ²⁶ Facebook does not provide dates nor any transparency regarding those who gang-stalk, cyberbully or harm others, including impersonations.

1 likeness of plaintiff and defendants' GoFundMe webpage. This shows that defendants gained
2 commercial benefit and/or were able to further the harm they intended to cause plaintiff through their
3 above-noted misappropriation of name and likeness of plaintiff. Further, defendants received money
4 and other forms of rewards for harming plaintiff on Facebook.

5
6 242. As a result of defendants' misappropriation of name and likeness of plaintiff he was
7 harmed.

8 243. Defendants' conduct was a substantial factor in cause plaintiff harm.

9 244. Unless and until enjoined and restrained by order of this Court, defendants' wrongful
10 conduct will continue to cause irreparable harm to plaintiff, entitling him to seek declaratory relief.

11 245. This action, if successful, will enforce an important right affecting the public interest
12 would confer a significant benefit, whether pecuniary or non-pecuniary, for the general public.
13 Because this case is brought for the purposes of enforcing important rights affect the public interest,
14 plaintiff also seeks recovery of attorney's fees and costs in prosecuting this action against defendants
15 under code of civil procedure § 1021.5 and other applicable law.
16

17
18 **XV.**
ELEVENTH CAUSE OF ACTION
CIVIL HARASSMENT

19 *Against Defendants AWDTSO, The Daily Mail, Sheridan, Bates, Pedler, Parashar, Saunt, Katherine*
20 *Poer-Anthony, Anonymous organizer, Gibbons, Shariat, Vanderford, Blalock, Burger, Valdes, Wiz,*
21 *Rodriguez, Anonymous Facebook account and "Holden_Guardian_Co"*

22 246. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
23 they were fully set forth herein.

24 247. Defendants elaborately plotted and executed their conspiracy to harm plaintiff. The
25 timing of the national and international news outlets promoting their harmful GoFundMe webpage
26 along with the litany of Daily Mail hit-pieces on plaintiff to billions of viewers is unmistakable. This
27 was a clear tactic to harass plaintiff and distract from their stalking of him.
28

1 248. Online stalking and harassing led to off-stalking and harassment. Said online
2 conspiracy expanded to tracking plaintiff's whereabouts, contacting his loved ones, digging up
3 plaintiff's personal information to put on public display, and conspiring to harm them. This was
4 witnessed by several people who warned plaintiff who was forced to alert his family and friends,
5 change his parking location, look for trackers on his car, change his work address, change his phone
6 number and email address, and close off to the public world while said cyberbullying and off-line
7 attacks continued, including death threats. Defendant even shamelessly profited from their harm
8 unjustly on said charity websites like GoFundMe. Still today defendants online and offline assault on
9 plaintiff continues.
10

11 249. The harassment occurred via defamatory language; it was also visual in the form of
12 online postings and images, many of which included texts; and thus also represents "Internet
13 harassment", media harassment, "doxing" and other forms of offensive conduct (California Penal
14 Code § 653.2).
15

16 250. During their conspiracy defendants aggressively abused social media, recruited new
17 members and elaborately plotted to "plant seeds of speculation" around their defamatory statements
18 to deny plaintiff's basic rights to "life and liberty, acquiring possession, and protecting property, and
19 pursuing and obtaining safety, happiness and privacy." Cal. Const. Art. I., § 1. Further, defendants
20 also sought to profit from books, documentaries etc. that defendants planned to produce following
21 said malicious harm.
22

23 251. Unless and until enjoined and restrained by order of this Court, defendants' wrongful
24 conduct will continue to cause irreparable harm to plaintiff, entitling him to seek declaratory relief.
25

26 252. This action, if successful, will enforce an important right affecting the public interest
27
28

1 would confer a significant benefit, whether pecuniary or non-pecuniary, for the general public.
2 Because this case is brought for the purposes of enforcing important rights affect the public interest,
3 plaintiff also seeks recovery of attorney’s fees and costs in prosecuting this action against defendants
4 under code of civil procedure § 1021.5 and other applicable law.
5

6 **XVI.**
7 **TWELFTH CAUSE OF ACTION**
8 **UNJUST ENRICHMENT**

9 *Against Defendants AWDTSO, The Daily Mail, Sheridan, Bates, Pedler, Parashar, Saunt, Katherine*
10 *Poer-Anthony, Anonymous organizer, Gibbons, Shariat, Vanderford, Blalock, Burger, Valdes, Wiz,*
11 *Rodriguez, Anonymous Facebook account and “Holden_Guardian_Co”*

12 253. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
13 they were fully set forth herein.

14 254. Defendants unjustly enriched themselves based upon their defamation, harassment and
15 harm caused to plaintiff.

16 255. Specifically, defendants received money and other rewards on Facebook for said
17 harm, as well as at least \$5,747.00 via their GoFundMe webpage that they initiated on 7 February
18 2024.

19 256. Defendants have further made several statements regarding books, documentaries etc.
20 that they have sought to produce in regard to the harm they have caused plaintiff and from which they
21 intended to profit.

22 257. Unless and until enjoined and restrained by order of this Court, defendants’ wrongful
23 conduct will continue to cause irreparable harm to plaintiff, entitling him to seek declaratory relief.

24 258. This action, if successful, will enforce an important right affecting the public interest
25 would confer a significant benefit, whether pecuniary or non-pecuniary, for the general public.

26 Because this case is brought for the purposes of enforcing important rights affect the public interest,
27
28

1 plaintiff also seeks recovery of attorney's fees and costs in prosecuting this action against defendants
2 under code of civil procedure § 1021.5 and other applicable law.

3
4 **XVII.**
5 **THIRTEENTH CAUSE OF ACTION**
6 **SEX-BASED DISCRIMINATION**
7 **IN VIOLATION OF THE UNRUH CIVIL RIGHTS ACT**
8 (California Civil Code § 51)

9 *Against Defendants AWDTSO, The Daily Mail, Sheridan, Bates, Pedler, Parashar, Saunt, Katherine*
10 *Poer-Anthony, Anonymous organizer, Gibbons, Shariat, Vanderford, Blalock, Burger, Valdes, Wiz,*
11 *Rodriguez, Anonymous Facebook account and "Holden_Guardian_Co"*

12 259. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
13 they were fully set forth herein.

14 260. Discrimination in violation of the Unruh Act is an unlawful and unfair business
15 practice under the Unfair Competition Law, Bus. & Prof. Code §§ 17200 et seq. and thus a victim of
16 such discrimination can also state a claim under the Unfair Competition Law (*People v. McKale*, 25
17 Cal. 3d 626, 637, 159 Cal. Rptr. 811, 602 P.2d 731 (1979)), the same conduct is actionable under
18 both the Unfair Competition Law and Unruh Act (*Pines v. Tomson*, 160 Cal. App. 3d 370, 379-81,
19 206 Cal. Rptr. 866 (2d Dist. 1984)).

20 261. The California Supreme Court held that the Unruh Act only applied to discrimination
21 by a business establishment "in the course of furnishing goods, services or facilities to its clients,
22 patrons or customers." (This rule was reaffirmed by the California Supreme Court in *Rojo v. Kliger*,
23 52 Cal.3d 65, 77, 276 Cal. Rptr. 130, 801 P.2d 373, 54 Fair Empl. Prac. Cas. (BNA) 1146.6 I.E.R.
24 Cas. (BNA) 530, 55 Empl. Prac. Dec. (CCH) ¶ 40480 (1990)) Defendants are in the business of
25 furnishing goods and services to its clients, patrons, and customers.

26 262. The Unruh Civil Rights Act proscribes arbitrary discrimination based on an
27
28

1 individual's sex i.e. gender, a personal characteristic similar to the classifications enumerated in the
2 Act. "Unequal treatment" as a result of a business practice, within the meaning of the Unruh Civil
3 Rights Act, includes offering price discounts on an arbitrary basis to certain classes of individuals.

4 263. Civil Code section 51, et seq., also known as the Unruh Act, provides that all persons
5 in the state are entitled to the "full and equal accommodations, advantages, facilities, privileges, or
6 services in all business establishments of every kind whatsoever," regardless of sex.

7 264. In this case the defamatory statements in Facebook AWDTSF forums, on defendants'
8 GoFundMe webpage, in the Daily Mail articles, in Valdes' false police report, in the anonymous
9 comments on other platforms like Reddit were all motivated by an assault on plaintiff, in no small
10 part, just because plaintiff happens to be male.

11 265. Facebook forums such as AWDTSF exclude men from their groups while they are
12 aware of egregious violations of and serious crimes against the men they exclude, said Facebook
13 groups sexually discriminated against plaintiff.

14 266. Anonymous Facebook group moderators, administrators et al. denied plaintiff's
15 request to join said Facebook forums because of his sex.

16 267. Plaintiff sex was a substantial motivating reason for defendants refusing to allow
17 plaintiff to defend himself.

18 268. Plaintiff was harmed.

19 269. Defendants' conduct was a substantial factor in causing plaintiff harm.

20 270. Civ. Code § 52, subd. (a) provides that a victim of discrimination prohibited by the
21 Unruh Act may receive, as determined by a jury or court, up to three times the amount of his or her
22 actual damages "but in no case less than \$4,000 for 'each and every offense.'"

23 271. This statute enacted by the legislature and signed by the governor states no less than
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1 \$4,000 for each offense. The legislature is sending a message to businesses not to discriminate
2 against protected classes. Actual damages “means special and general damages.” (Civ. Code § 52,
3 subd. (h)) An award of statutory minimum damages does not require proof of any actual damages
4 (*Koire v. Metro Car Wash*, 40 Cal. 3d 24, 33-34, 219 Cal. Rptr. 133, 707 P.2d 195 (1985); *Botosan v.*
5 *Paul McNally Realty*, 216 F.3d 827, 835, 10 A.D. Cas. (BNA) 1185 (9th Cir. 2000)). In *Hubbard v.*
6 *Rite Aid Corporation*, 433 F.Supp.2d 1150 (S.D. Cal. 2006), the court awarded statutory damages of
7 \$12,000 to each of two disability discrimination plaintiffs on the grounds that the evidence
8 established that each plaintiff was denied full access to defendant’s retail store on three different
9 visits to the store.
10

11 272. As the above-noted harm to plaintiff shows, there have been hundreds of harassing,
12 defamatory, cyberbullying comments by hundreds of Facebook accounts for years seen by billions of
13 people worldwide. As a minimum plaintiff requests compensatory damages of \$100,000 per month
14 starting from the time when these comments were first posted in 2022 (or before) until they finally
15 cease sometime in the future from now.
16

17 273. This claim is made well with the two-year statute of limitations, in particular because,
18 although since the filing of police and FBI reports hundreds of the comments harming plaintiff in said
19 Facebook groups were removed and/or deleted, many still remain.
20

21 274. Civ. Code § 52, subd. (a) also provides for an award of attorney’s fees against a
22 defendant who violated the Act (*Engel v. Worthington*, 60 Cal. App. 4th 628, 635, 70 Cal. Rptr. 2d
23 526, 122 Ed. Law Rep. 1257 (4th Dist. 1997)) holds that an award of fees to a prevailing Unruh Civil
24 Rights Act plaintiff is “mandatory.”
25

26 275. Plaintiff alleges defendants conduct herein is malicious, reckless, wanton, oppressive,
27 and fraudulent.
28

276. As a proximate result of the wrongful actions of defendants, and each of them, plaintiff has suffered harm, including but not limited to, lost earnings and other employment benefits, loss of future employment benefits, including insurance and pension, mental anguish and emotional distress, bills for medical and psychological treatment, humiliation, embarrassment, mental anguish, and physical harm, all in an amount to be proven at trial but exceeding the minimum jurisdictional limits of this court.

277. Plaintiff is further informed and believes, and based thereon alleges, that defendants, and each of them, acted and continue to act, with full knowledge of the consequences and damage being caused to plaintiff, by defendants' actions, and defendants' actions were, and are, willful, oppressive, and malicious. Accordingly, plaintiff is entitled to punitive damages against defendants, and each of them, in a sum according to proof at trial.

278. Plaintiff has incurred, and will continue to incur, attorneys' fees in the prosecution of this action and therefore demand such reasonable attorneys' fees and costs as set by the court.

**XVIII.
FOURTEENTH CAUSE OF ACTION
GENDER VIOLENCE
IN VIOLATION OF CALIFORNIA CIVIL CODE § 52.4**

Against Defendants AWDTSO, The Daily Mail, Sheridan, Bates, Pedler, Parashar, Saunt, Katherine Poer-Anthony, Anonymous organizer, Gibbons, Shariat, Vanderford, Blalock, Burger, Valdes, Wiz, Rodriguez, Anonymous Facebook account and “Holden Guardian Co”

279. Plaintiff incorporates all allegations of this complaint and re-alleges them as though they were fully set forth herein.

280. Plaintiff is informed and believes and otherwise alleges that defendants would engage in the above-noted conduct and by their actions and inactions ratified, authorized and condoned this unlawful behavior.

281. California Civil Code Section 52.4 provides:

1 (a) Any person who has been subjected to gender violence may bring a civil action for
2 damages against any responsible party. The plaintiff may seek actual damages,
3 compensatory damages, punitive damages, injunctive relief, any combination of those,
4 or any other appropriate relief. A prevailing plaintiff may also be awarded attorney's
5 fees and costs.

6 (b) An action brought pursuant to this section shall be commenced within three years
7 of the act, or if the victim was a minor when the act occurred, within eight years after
8 the date the plaintiff attains the age of majority or within three years after the date the
9 plaintiff discovers or reasonably should have discovered the psychological injury or
10 illness occurring after the age of majority that was caused by the act, whichever date
11 occurs later.

12 (c) For purposes of this section, "gender violence," is a form of sex discrimination and
13 means any of the following:

14 (1) One or more acts that would constitute a criminal offense under state law
15 that has as an element the use, attempted use, or threatened use of physical
16 force against the person or property of another, committed at least in part based
17 on the gender of the victim, whether or not those acts have resulted in criminal
18 complaints, charges, prosecution, or conviction.

19 (2) A physical intrusion or physical invasion of a sexual nature under coercive
20 conditions, whether or not those acts have resulted in criminal complaints,
21 charges, prosecution, or conviction.

22 (d) Notwithstanding any other laws that may establish the liability of an employer for
23 the acts of an employee, this section does not establish any civil liability of a person
24 because of her or her status as an employer, unless the employer personally committed
25 an act of gender violence.

26 282. Plaintiff alleges that in as far back as 2019 and through the present, defendants
27 violated California Civil Code Section 52.4 in that one or more acts inflicted on plaintiff constitutes a
28 criminal offense under state law that has as an element of use, attempted use, or threatened use of
physical force against her person, committed at least in part based on the gender (sex) of plaintiff,
whether or not those acts have resulted in criminal complaints, charges, prosecution, or conviction.

283. As noted above, because Facebook and said Facebook groups refused to respond
whatsoever plaintiff had no option but to file police reports against defendants with the Federal
Bureau of Investigations ("FBI") as well as several police and Sherriff departments within Los
Angeles, Orange County, Irvine and Huntington Beach, etc. And since the filing of said police and

1 FBI reports against defendants more than four-hundred (400) severely harmful comments have been
2 taken down within said Facebook groups.

3 284. That cyberbullying (which often leads to its victim's suicide) and electronic
4 harassment are serious crimes is shown California Penal Code § 653.2 wherein it illegal to harass
5 someone by distributing, posting, emailing and/or disclosing any other person's information without
6 his or her consent, in particular when the likely effect would occur when said sending or distribution
7 would incite and/or harass a third party.
8

9 285. As also noted above: the Facebook groups wherein defendants committed serious
10 crimes and civil violations against plaintiff, including cyberbullying and electronic harassment,
11 severe defamation, etc. occurred are Facebook groups that allegedly exist to protect women.
12

13 286. Defendants clearly conspired to harm plaintiff because of his sex as a male. This is
14 shown in how administrators and moderators both: 1) violated plaintiff's rights to free speech to
15 defend himself by refusing to allow him to join said Facebook groups; and 2) coached their co-
16 conspirators on how to cyberbully, harass, defame, etc. plaintiff, as when Sanchez would instruct her
17 co-conspirators to use a coded language that included phrases such as, but not limited to: "Does
18 anyone have any tea to spill?"
19

20 287. Prior to filing this lawsuit plaintiff in good faith diligently tried to join said
21 Facebook groups to defend himself many times e.g. on 26 February 2023 and again on 28 February
22 2023 and after. But given that Facebook and its administrators and moderators are conspiring with
23 the above-noted crimes against plaintiff, Facebook and its administrators and moderators refused to
24 allow plaintiff to join these groups.
25

26 288. Plaintiff and others have inquired these groups to produce evidence that they have
27
28

1 protected women since at least 2022 and still today in late 2023 none of these Facebook groups have
2 responded, much less produced any evidence that they have protected a single woman ever.

3 289. Within these Facebook groups is an irrational and seething hatred toward men.

4 290. And because plaintiff continues to be criminally cyberbullied, harassed and defamed
5 on said Facebook groups still today, this claim is made well with the statute of limitations.
6

7 **XIX.**
8 **FIFTEENTH CAUSE OF ACTION**
9 **CYBERBULLYING**
10 *Against All Defendants*

11 291. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
12 they were fully set forth herein.

13 292. Herein cyberbullying is understood as two or more online accounts targeting a person
14 for the sake of harassing or “doxing” or defaming or impersonating said person’s name or likeness.

15 293. The serious harm caused by cyberbullying noted above escalates significantly: 1) the
16 greater the number of online users who witness said conduct; 2) the victim is not given notice of said
17 conduct and/or subject to sudden and surprising publications; 3) the online group(s) wherein
18 members are making said statements refuse to allow the victim, should he or she become aware of
19 said conduct, to join the online group(s) and defend him or herself; 4) those online users committing
20 cyberbullying use anonymous accounts such that their real-world identities are masked by false
21 and/or fake names; 5) the victim is gang-stalked; 6) the online harassment also occurs off-line; and 7)
22 as a result of this harm the victim is reasonable forced to live in fear e.g. change phone numbers,
23 move, warn his or her loved one.
24

25 294. Given the seriousness of this severe form of attack, cyberbullying herein carries treble
26 punitive damages if any of the above-noted escalating conditions occur.
27

28 295. In this case plaintiff was cyberbullied by hundreds of Facebook accounts who posted

1 the above-noted severely harmful statements to hundreds of millions of users online (Facebook is the
2 the world's most popular social media platform, with billions of daily users); he was never given
3 notice of any of the harmful statements; defendants conspired elaborately to keep him unaware of the
4 harm they caused him; after plaintiff discovered defendants' conduct, they refused to let him join the
5 Facebook forums such that they wanted him to have no defense against their malicious crimes and
6 civil torts; defendants consist mostly of anonymous accounts with false and/or fake names which they
7 used to gang-stalk plaintiff online and offline, forcing him to to alert his family and friends, change
8 his parking location, look for trackers on his car, change his work address, change his phone number
9 and email address, and close off to the public world while said cyberbullying and off-line attacks
10 continued, including death threats.
11

12
13 296. Defendants then went on to create a harmful GoFundMe webpage that they promoted
14 to billions of users world-wide on national and international news media outlets and which was
15 further promoted by outlets like the Daily Mail.

16
17 297. Plaintiff was cyberbullied as a result of the Facebook, AWDTSO and Daily Mail apps,
18 their algorithms, groups, points, reward incentives, including, but not limited to "Facebook points".
19 But not for the defective and liable products of defendants, their negligence, their deceptive business
20 practices, their sexual discrimination, their gender violence alongside their defamation, false light,
21 intentional infliction of emotional distress, misappropriation of name and likeness, civil harassment,
22 unjust enrichment and conspiracy to commit the above-noted serious crimes and civil torts, plaintiff
23 would not have suffered any such injury.
24

25 298. Plaintiff is further informed and believes, and based thereon alleges, that defendants,
26 and each of them, acted and continue to act, with full knowledge of the consequences and damage
27 being caused to plaintiff, by defendants' actions, and defendants' actions were, and are, willful,
28

1 oppressive, and malicious. Accordingly, plaintiff is entitled to treble punitive damages against
2 defendants, and each of them, in a sum according to proof at trial.

3 299. Plaintiff has incurred, and will continue to incur, attorneys' fees in the prosecution of
4 this action and therefore demand such reasonable attorneys' fees and costs as set by the court.
5

6 **XX.**
7 **SIXTHTEENTH CAUSE OF ACTION**
8 **CONSPIRACY TO VIOLATE**
9 **PLAINTIFF'S REPUTATION, IDENTITY, IMAGE;**
10 **TO HARASS HIM; TO CAUSE HIM EMOTIONAL DISTRESS;**
11 **TO UNJUST ENRICHMENT; TO DISCRIMINATE AGAINST PLAINTIFF'S SEX; AND**
12 **TO CYBERBULLY PLAINTIFF**
13 *Against All Defendants*

14 300. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
15 they were fully set forth herein.

16 301. Defendants' conspired to gang-stalk, harass, defame, emotionally distress,
17 impersonate, discriminate against and cyberbully plaintiff.

18 302. During their conspiracy defendants aggressively abused social media, national and
19 international news media outlets, recruited new members and elaborately plotted to "plant seeds of
20 speculation" around their defamatory statements to deny plaintiff's basic rights to "life and liberty,
21 acquiring possession, and protecting property, and pursuing and obtaining safety, happiness and
22 privacy." Cal. Const. Art. I., § 1. Further, defendants also sought to profit from books, documentaries
etc. that defendants planned to produce following said malicious harm.

23 303. Defendants coordinated their stories of plaintiff stalking and committing murder and
24 how their statements could reach the most amount of people to cause the most amount of harm, for
25 instance, how defendants initiated a media smear campaign after this case was filed.

26 304. Plaintiff is further informed and believes, and based thereon alleges, that defendants,
27
28

1 and each of them, acted and continue to act, with full knowledge of the consequences and damage
2 being caused to plaintiff, by defendants' actions, and defendants' actions were, and are, willful,
3 oppressive, and malicious. Accordingly, plaintiff is entitled to treble punitive damages against
4 defendants, and each of them, in a sum according to proof at trial.

5
6 305. Further, plaintiff was cyberbullied as a result of the Facebook, AWDTSB and Daily
7 Mail apps, their algorithm, groups, reward incentives, including, but not limited to "Facebook
8 points". But not for the defective and liable products of defendants, their negligence, their deceptive
9 business practices, their sexual discrimination, their gender violence alongside their defamation, false
10 light, intentional infliction of emotional distress, misappropriation of name and likeness, civil
11 harassment, unjust enrichment and conspiracy to commit the above-noted serious crimes and civil
12 torts, plaintiff would not have suffered any such injury.

13
14 306. Plaintiff has incurred, and will continue to incur, attorneys' fees in the prosecution of
15 this action and therefore demand such reasonable attorneys' fees and costs as set by the court.

16
17 **XXI.**
DECLARATORY RELIEF
18 *Against All Defendants*

19 307. Plaintiff incorporates all allegations of this complaint and re-alleges them as though
20 they were fully set forth herein.

21 308. Because of the ongoing severe harm suffered by plaintiff, he requests a judicial
22 declaration for defendants to remove and/or delete any and all defamatory and/or disparaging
23 statements about plaintiff and/or statements misrepresenting plaintiff.

24
25 309. Further, plaintiff requests a judicial declaration prohibiting defendants from repeating
26 and/or circulating such defamatory, disparaging and misrepresenting statements in the future.

27 310. In particular, plaintiff requests a judicial declaration wherein the court orders that
28

1 defendants, their agents, all persons acting on their behalf or purporting to act on their behalf and all
2 other persons in active concert and participation with them, be and hereby are, permanently enjoined
3 from engaging in and/or performing directly, any of the following acts:

4 311. Defendants are prohibited from initiating contact with plaintiff and/or any and all
5 persons known to plaintiff and/or any and all associates of plaintiff. Any complaints defendants may
6 have concerning plaintiff must be communicated to an associate of plaintiff who will be identified by
7 plaintiff for defendants.
8

9 312. Defendants are prohibited from making the following defamatory and fictitious
10 statements about plaintiff to third persons: plaintiff has been involved in a murder case; that plaintiff
11 has been charged with any crime whatsoever; that plaintiff has been convicted of any crime
12 whatsoever; that plaintiff is deceitful and/or acts fraudulently; that plaintiff has taken an interest in, or
13 ever stalked and/or harassed any of them, etc.
14

15 313. Defendants are prohibited from posting about plaintiff whatsoever, including posting
16 of his personal and private information, pictures, texts, telephone number, address, medical
17 information, etc.
18

19 314. Defendants are prohibited from filming (whether by video camera or still
20 photography) within fifty (50) feet of plaintiff and/or his premises.

21 315. Defendants are prohibited from using Facebook and/or any Meta social media and/or
22 AWDTSO apps and/or such similar online platforms and/or apps (including, but not limited to:
23 Instagram, Whatsapp, etc.).
24

25 316. Defendants are prohibited from reporting plaintiff to any third party whatsoever.
26
27
28

1 **PRAYER FOR RELIEF**

2 Plaintiff prays for relief as follows:

- 3 1) A permanent declaration enjoining and restraining defendants and all persons or entities in
4 concert with them from committing any violations of law against plaintiff as set forth
5 above;
6
7 2) For economic damages, to be proven at trial;
8
9 3) For general, special and compensatory damages, to be proven at trial;
10
11 4) For exemplary and punitive damages to be proven at trial;
12
13 5) For an award of \$100,000,000.00 in damages.
14
15 6) For costs of suit and reasonable attorney fees herein incurred;
16
17 7) For pre- and post-judgment interest at the maximum allowable rate on any amounts
18 awarded;
19
20 8) For a tax-neutralization award;
21
22 9) For attorney fees;
23
24 10) For such other and further relief as the court may deem just and proper.

25 Dated: 2 February 2025

/s/Stewart Lucas Murrey

Dr. Stewart Lucas Murrey

Plaintiff in *Pro Per*

26 **DEMAND FOR TRIAL BY JURY**

27 Plaintiff Dr. Stewart Lucas Murrey hereby demands a trial by jury, as to the law and the facts.

28 Dated: 2 February 2025

/s/Stewart Lucas Murrey

Dr. Stewart Lucas Murrey

Plaintiff in *Pro Per*